

Awni Abu Hba
April 07, 2021

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2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x
5 SHABTAI SCOTT SHATSKY, ET AL.,

6 Plaintiffs,

7 Civil No.:
8 8 CIV. 12355 (MKV)

9 -against-

10 THE PALESTINE LIBERATION ORGANIZATION, ET AL.,

11 Defendants.

12 - - - - -x

13 DEPOSITION OF

14 Awni Abu Hba

15 Taken on April 7, 2021

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Page 2				Page 4			
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2		I N D E X		2		*****	
3	WITNESS	EXAMINATION BY	PAGE	3		VIDEO-RECORDED REALTIME DEPOSITION of AWNI ABU HBDA,	
4	AWNI ABU HBDA	MR. SINAICO	10	4		held on April 7, 2021, at 9:38 a.m., was sworn	
5	AWNI ABU HBDA	MR. BERGER	154	5		before AMBRIA IANAZZI, a Registered Professional	
6				6		Reporter, Certified Realtime Reporter, and Notary	
7				7		Public.	
8				8		*****	
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1				1			
2		(CONT'D)		2		A P P E A R A N C E S:	
3		I N D E X		3			
4		MARKED FOR IDENTIFICATION		4		COHEN & GRESSER LLP	
5	EXHIBIT	DESCRIPTION	PAGE	5		Counsel for Plaintiffs	
6	Exhibit 1	Subpoena	18	6		800 Third Avenue	
7	Exhibit 2	Tab 1	28	7		New York, New York 10022	
8	Exhibit 3	Tab 8	32	8		BY: STEPHEN M. SINAICO, ESQ.	
9	Exhibit 4	Tab 2	52	9		ssinaiko@cohengresser.com	
10	Exhibit 5	Declaration of C. Russell	70	10		ERICA LAI, ESQ.	
11	Exhibit 6	Subpoena to Produce	120	11		elai@cohengresser.com	
12	Exhibit 7	Tab 13	124	12		ANDREW PECORARO, ESQ.	
13	Exhibit 8	Tab 15	127	13		apecoraro@cohengresser.com	
14	Exhibit 9	Tab 11	136	14		SQUIRE PATTON BOGGS	
15				15		Attorneys for Defendants	
16				16		1211 6th Avenue, 26th Floor	
17				17		New York, New York 10036	
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						Washington, D.C. 20005	
						BY: SARAH KROPF, ESQ.	

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6 to 9

Page 6	Page 8
<p>1 (CONT'D)</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4</p> <p>5 ALSO PRESENT:</p> <p>6</p> <p>7 COSETTE VINCENT, Cohen & Gresser</p> <p>8 ELIZABETH BEZVERKHA, Cohen & Gresser</p> <p>9 HADEER AL AMIRI, Interpreter</p> <p>10 NAWEL MESSAOUDI, Interpreter</p> <p>11 COREY WAINAINA, Videographer</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1</p> <p>2 THE VIDEOGRAPHER: Good morning. We are</p> <p>3 now on the record. The participants should be</p> <p>4 aware that this proceeding is being recorded, and,</p> <p>5 as such, all conversations held will be recorded,</p> <p>6 unless there is a request and agreement to go off</p> <p>7 the record. This is the remote video-recorded</p> <p>8 deposition of Awni Abu Hbda. Today is Wednesday,</p> <p>9 April 7th, 2021. The time is now 13:39 UTC.</p> <p>10 We are here in the matter of Shatsky</p> <p>11 versus PLO. My name is Corey Wainaina. I am the</p> <p>12 remote video technician on behalf of U.S. Legal</p> <p>13 Video Support, located at 90 Broad Street, New</p> <p>14 York, New York. I'm not related to any of the</p> <p>15 Parties in the Action, nor am I financially</p> <p>16 interested in the outcome of the case.</p> <p>17 At this time, will the court reporter,</p> <p>18 Ambria Ianazzi, on behalf of U.S. Legal Support,</p> <p>19 please enter the statement for remote proceeding</p> <p>20 into the record.</p> <p>21 MR. SINAIKO: Before we get started with</p> <p>22 Mr. Abu Hbda, I would just like to go around to</p> <p>23 counsel on the call and confirm that we all</p> <p>24 stipulate under the Rule 29 of the Federal Rules</p> <p>25 of Civil Procedure that Ms. Ianazzi, although</p>
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<p>1</p> <p>2 - o o o -</p> <p>3</p> <p>4 A W N I A B U H B D A, the WITNESS</p> <p>5 herein, after having been first duly sworn by</p> <p>6 a Notary Public, was examined and testified</p> <p>7 through an</p> <p>8 interpreter as follows:</p> <p>9</p> <p>10 - o o o -</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1</p> <p>2 she's in New York, is an appropriate officer</p> <p>3 before whom to take this deposition; does</p> <p>4 everybody so stipulate?</p> <p>5 MR. BERGER: For Defendants, yes. This is</p> <p>6 Mitchell Berger from Squire, Patton, Boggs.</p> <p>7 MR. SINAIKO: And Counsel for the Witness?</p> <p>8 MS. KROFF: We're fine with that. Thank</p> <p>9 you.</p> <p>10 MR. SINAIKO: Okay.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 10</p> <p>1 A. ABU HBDA</p> <p>2 EXAMINATION BY</p> <p>3 MR. SINAICO:</p> <p>4 Q. And Mr. Abu Hbda, let me introduce myself.</p> <p>5 My name is Steve Sinaiko. I'm a partner in the law</p> <p>6 firm Cohen & Gresser LLP. We represent the</p> <p>7 Plaintiffs in this litigation and we appreciate you</p> <p>8 being here today. Have you ever had your deposition</p> <p>9 taken before, Mr. Abu Hbda?</p> <p>10 A. No.</p> <p>11 Q. Okay. Have you ever testified in court,</p> <p>12 in the United States, prior to today?</p> <p>13 A. No.</p> <p>14 Q. Okay. I'm just going to take a couple of</p> <p>15 minutes to go over some ground rules for our</p> <p>16 deposition today. First of all, you are here on the</p> <p>17 record. There is a court reporter and a</p> <p>18 videographer recording everything that we say today.</p> <p>19 In order to ensure that we have an</p> <p>20 accurate record, and especially because this</p> <p>21 deposition is being taken by videoconference,</p> <p>22 instead of in person, due to the COVID-19 Pandemic,</p> <p>23 it's important that we not speak over one another,</p> <p>24 and more than one person speaks at a time.</p> <p>25 So, I would be grateful if you wait until</p>	<p style="text-align: right;">Page 12</p> <p>1 A. ABU HBDA</p> <p>2 - o o o -</p> <p>3</p> <p>4 N A W E L M E S S A O U D I,</p> <p>5 Called as the interpreter in this</p> <p>6 matter, was duly sworn by a Notary Public to</p> <p>7 accurately and faithfully translate the</p> <p>8 questions propounded to the Awni Abu Hbda</p> <p>9 from English into Arabic, and the answers</p> <p>10 given by the Awni Abu Hbda from Arabic into</p> <p>11 English.</p> <p>12</p> <p>13 - o o o -</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 11</p> <p>1 A. ABU HBDA</p> <p>2 I finish my questions before you start answering</p> <p>3 them, and, of course, I'll try to wait until you</p> <p>4 finish your answers before I ask my next question;</p> <p>5 is that okay?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 MS. KROPF: And sorry to interrupt, I</p> <p>9 think we'll have the translator translate your</p> <p>10 questions going forward; is that okay?</p> <p>11 MR. SINAICO: For the record, all my</p> <p>12 questions are being translated by the translator.</p> <p>13 Mr. Abu Hbda is being translated, answering the</p> <p>14 questions in English, and the questions are not</p> <p>15 being translated at this time.</p> <p>16 Q. Okay. As we work through our questions</p> <p>17 today, it's important that you respond to questions</p> <p>18 verbally because the court reporter and the record</p> <p>19 can't capture nods of the head, or gestures of the</p> <p>20 hand, so it's important to give verbal answers to my</p> <p>21 questions; is that okay?</p> <p>22 THE INTERPRETER: Yeah. I'm supposed to</p> <p>23 swear first. I'm sorry.</p> <p>24 MR. SINAICO: Oh, we need to swear in the</p> <p>25 translator.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: I'm sorry, I'm not</p> <p>3 supposed to do before the oath.</p> <p>4 Q. Okay. Mr. Abu Hbda, let's just -- let's</p> <p>5 just go back and translate, for Mr. Abu Hbda, my</p> <p>6 last question.</p> <p>7 THE INTERPRETER: Can you please repeat</p> <p>8 it?</p> <p>9 MR. SINAICO: Oh, certainly.</p> <p>10 Q. As we go through our questions today,</p> <p>11 Mr. Abu Hbda, it's important that you give verbal</p> <p>12 answers, because the court reporter will not be able</p> <p>13 to capture, and the record will not be able capture,</p> <p>14 head nods and hand gestures.</p> <p>15 So, do you understand that you will need</p> <p>16 to give verbal answers to the questions that I ask</p> <p>17 you today?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. Thank you.</p> <p>21 Q. So, Mr. Abu Hbda, I'm going to be asking</p> <p>22 you a series of questions today. If at any time,</p> <p>23 there's a question you don't understand, please let</p> <p>24 me know, and I'll try to rephrase the question for</p> <p>25 you, or make it more clear. But understand that if</p>

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<p style="text-align: right;">Page 14</p> <p>1 A. ABU HBDA</p> <p>2 you do answer a question, I will assume, and the</p> <p>3 Court will assume, and everyone in this room will</p> <p>4 assume, that you understood each question that you</p> <p>5 respond to; do you understand?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. It is possible that during the</p> <p>8 course of our deposition today, your counsel or one</p> <p>9 of the other lawyers in the room may object to one</p> <p>10 of my questions. Unless your counsel instructs you</p> <p>11 not to answer a question that I've asked you, and</p> <p>12 your counsel is the only person who's permitted to</p> <p>13 so instruct you, you should answer my questions</p> <p>14 without regard to any objections that may be raised</p> <p>15 by any of the lawyers in the room; do you</p> <p>16 understand?</p> <p>17 A. Yes. Okay.</p> <p>18 MR. SINAICO: Just for the record, I</p> <p>19 think -- I think, going forward, the translator</p> <p>20 has been translating Mr. Abu Hbda's answers, and I</p> <p>21 think it's just going to go more smoothly if we</p> <p>22 have all of the answers translated, just for the</p> <p>23 record. I know that the answers have all been</p> <p>24 translated.</p> <p>25 And, you know, Sara, unless you object to</p>	<p style="text-align: right;">Page 16</p> <p>1 A. ABU HBDA</p> <p>2 MR. BERGER: Yeah. If the translator is</p> <p>3 translating it from the realtime, we would like to</p> <p>4 have it.</p> <p>5 MR. SINAICO: Okay. Great. So, we could</p> <p>6 reach out to the support people from U.S. Legal,</p> <p>7 so you could have the realtime.</p> <p>8 THE VIDEOGRAPHER: You guys want to go off</p> <p>9 the record?</p> <p>10 MR. MR. SINAICO: Let's go off the record.</p> <p>11 THE VIDEOGRAPHER: The time is 13:55.</p> <p>12 (Whereupon, a short recess was taken.)</p> <p>13 THE VIDEOGRAPHER: We are now back on the</p> <p>14 record. The time is 14:15 UTC Time.</p> <p>15 Q. Mr. Abu Hbda, just before we took this</p> <p>16 short break, I was about to tell you that in the</p> <p>17 event that, you know, I will be taking periodic</p> <p>18 breaks during the deposition, and I understand that</p> <p>19 you will need breaks, and I understand from your</p> <p>20 counsel that you will need periodic breaks, just let</p> <p>21 me know, or let Ms. Kropf know, and we will do that.</p> <p>22 I just ask that if there's a pending question, that</p> <p>23 you will not take a break before you answer the</p> <p>24 question; is that okay?</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 15</p> <p>1 A. ABU HBDA</p> <p>2 it, I think we should have all the answers</p> <p>3 translated; it's going to go more smoothly.</p> <p>4 MS. KROPP: That's fine. So, Awni, you</p> <p>5 can have the answers translated to English and,</p> <p>6 then you can answer in Arabic; okay?</p> <p>7 A. I prefer speaking in Arabic.</p> <p>8 Q. Okay.</p> <p>9 MR. BERGER: Excuse me, I have a question.</p> <p>10 This is Mitchell Berger. Is the translator</p> <p>11 translating from a realtime transcript, because we</p> <p>12 don't have that, or is she translating from notes</p> <p>13 that she is taking, or from what Steve is saying?</p> <p>14 MR. SINAICO: Mitch, are you asking to</p> <p>15 have the realtime because I think we can arrange</p> <p>16 that, if --</p> <p>17 MR. BERGER: We ordered the realtime. It</p> <p>18 hasn't been provided to us.</p> <p>19 MR. SINAICO: Do we have a support person</p> <p>20 from U.S. Legal today, because I'm sure we do.</p> <p>21 MR. BERGER: My question is, is Mess</p> <p>22 translating from the realtime?</p> <p>23 MR. SINAICO: Okay. But my question is,</p> <p>24 if you didn't get the realtime, and we have the</p> <p>25 realtime, we would like you to have it.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Mr. Abu Hbda, are you currently</p> <p>3 under the influence of any medication or other</p> <p>4 substance that might inhibit your ability to</p> <p>5 understand and respond to questions?</p> <p>6 A. Not drugs, but I'm taking medication, yes.</p> <p>7 Q. Okay. And does the medication that you're</p> <p>8 taking, Mr. Abu Hbda, interfere with your ability to</p> <p>9 recall or understand questions?</p> <p>10 A. I don't think so.</p> <p>11 Q. Okay. And the medication that you're</p> <p>12 taking, Mr. Abu Hbda, does it interfere with your</p> <p>13 memory in any way?</p> <p>14 A. I'm not a doctor. I don't know.</p> <p>15 Q. Is it your sense, Mr. Abu Hbda, that</p> <p>16 there's any reason, as you sit here today, that</p> <p>17 you're unable to give your best testimony?</p> <p>18 A. I think I can do my best today.</p> <p>19 Q. Thank you very much. Okay.</p> <p>20 MR. SINAICO: Cosette, could we put up Tab</p> <p>21 14, please?</p> <p>22 MS. VINCENT: Yeah.</p> <p>23 MR. SINAICO: I would like to mark as our</p> <p>24 next exhibit, or our first exhibit, Exhibit 1, a</p> <p>25 three-page document titled, "Subpoena to Testify</p>

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<p style="text-align: right;">Page 18</p> <p>1 A. ABU HBDA</p> <p>2 at a Deposition in a Civil Action".</p> <p>3 (Whereupon, Subpoena was marked as Exhibit 1</p> <p>4 for identification, as of April 7th, 2021.)</p> <p>5 Q. Mr. Abu Hbda, do you have Exhibit 1? Are</p> <p>6 you able to see Exhibit 1?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And Mr. Abu Hbda, have you seen</p> <p>9 this document before?</p> <p>10 A. Yes.</p> <p>11 Q. And Mr. Abu Hbda, do you recognize this</p> <p>12 document to be a subpoena calling on you to testify</p> <p>13 in this deposition today?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And Mr. Abu Hbda, you're here today</p> <p>16 testifying pursuant to the Subpoena that we've</p> <p>17 marked as Exhibit 1, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Now, in advance of your deposition</p> <p>20 here today, did you do anything to prepare for the</p> <p>21 deposition?</p> <p>22 A. Yes.</p> <p>23 Q. Can you tell us, Mr. Abu Hbda, what you</p> <p>24 did to prepare for your deposition today.</p> <p>25 A. I saw all the document I have in my -- in</p>	<p style="text-align: right;">Page 20</p> <p>1 A. ABU HBDA</p> <p>2 with Ms. Kropf over the telephone in anticipation of</p> <p>3 your deposition?</p> <p>4 A. More than -- more than once, but I don't</p> <p>5 recall how many times.</p> <p>6 Q. Do you think it was more than five times?</p> <p>7 A. No; less.</p> <p>8 Q. Do you remember when the first time was</p> <p>9 that you spoke with Ms. Kropf, in anticipation of</p> <p>10 your deposition?</p> <p>11 MS. KROFF: I object. I mean, I think</p> <p>12 we're -- you asked if he talked to me. You asked</p> <p>13 what he did to prepare. When he first talked to</p> <p>14 me is not a relevant or a proper question here.</p> <p>15 MR. SINAIKO: You may answer.</p> <p>16 MS. KROFF: No.</p> <p>17 Mr. Abu Hbda, I instruct you not to</p> <p>18 answer.</p> <p>19 MR. SINAIKO: What's the basis for</p> <p>20 instructing him not answer when he spoke to you?</p> <p>21 MS. KROFF: Because it gets into</p> <p>22 attorney-client privilege communications, when he</p> <p>23 spoke to --</p> <p>24 MR. SINAIKO: I'm probing his answer. I'm</p> <p>25 entitled to ask how he spoke to you for the</p>
<p style="text-align: right;">Page 19</p> <p>1 A. ABU HBDA</p> <p>2 the office -- in my office.</p> <p>3 Q. Can you tell us what documents you looked</p> <p>4 at? To be more precise -- well, let me withdraw</p> <p>5 that.</p> <p>6 Can you tell us what the documents were</p> <p>7 that you looked at more specifically?</p> <p>8 A. Okay. The paper I do for the -- for</p> <p>9 the -- for my -- for my client, I sent to the --</p> <p>10 THE INTERPRETER: I'm sorry. I will ask</p> <p>11 him to repeat, because I didn't really understand.</p> <p>12 A. I checked -- I checked -- I checked the</p> <p>13 paper I used to -- I sent to the -- to my client, I</p> <p>14 used to send to the Embassy.</p> <p>15 Q. And were those papers for your notary</p> <p>16 public business, sir?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. In anticipation of your deposition</p> <p>19 today, Mr. Abu Hbda, did you meet with anybody?</p> <p>20 A. No.</p> <p>21 Q. Okay. So, did you meet with Ms. Kropf,</p> <p>22 your lawyer, in anticipation of the deposition</p> <p>23 today?</p> <p>24 A. I talked to her over the phone.</p> <p>25 Q. Okay. And how many times did you speak</p>	<p style="text-align: right;">Page 21</p> <p>1 A. ABU HBDA</p> <p>2 deposition today.</p> <p>3 MS. KROFF: And he answered. He spoke to</p> <p>4 me by phone and looked at the records. Any other</p> <p>5 questions is attorney-client privilege.</p> <p>6 MR. SINAIKO: That's an improper</p> <p>7 instruction. We'll have to go about that --</p> <p>8 MS. KROFF: Don't answer that question.</p> <p>9 Q. Aside from talking to Ms. Kropf, did you</p> <p>10 speak to anybody else in anticipation of your</p> <p>11 deposition?</p> <p>12 A. No.</p> <p>13 Q. By the way, when you spoke to Ms. Kropf in</p> <p>14 anticipation of your deposition, did those</p> <p>15 conversations take place in English?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. At any time before your deposition</p> <p>18 today, have you spoken to Mitchell Berger, who is</p> <p>19 attorney for the Defendants, and is on our</p> <p>20 videoconference today?</p> <p>21 A. No.</p> <p>22 Q. At any time before your deposition today,</p> <p>23 have you spoken with Mr. Gassan Baloul, who is also</p> <p>24 an attorney for the Defendants, and who is also on</p> <p>25 our videoconference today?</p>

<p style="text-align: right;">Page 22</p> <p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 Q. Okay. In advance of your deposition</p> <p>4 today, have you spoken with any lawyer associated</p> <p>5 with the law firm Squire, Patton, Boggs, who are</p> <p>6 Counsel for the Defendants in this action?</p> <p>7 A. No.</p> <p>8 Q. Okay. And your lawyer, Ms. Kropf, how did</p> <p>9 you --</p> <p>10 Before you received the Subpoena that</p> <p>11 we've marked as Exhibit 1, have you ever met or</p> <p>12 spoken to Ms. Kropf?</p> <p>13 MS. KROPP: Objection.</p> <p>14 And Mr. Abu Hbda, you do not need to</p> <p>15 answer that question.</p> <p>16 MR. SINAIKO: That is not a proper</p> <p>17 objection. Come on. I'm entitled to know when he</p> <p>18 spoke to you. I'm not asking for the substance of</p> <p>19 the communications. I'm just asking whether there</p> <p>20 were any, because --</p> <p>21 MS. KROPP: No, because it would have</p> <p>22 nothing to do with before he received the</p> <p>23 Subpoena, nothing to do with this case, in</p> <p>24 connection with this matter, and that's an</p> <p>25 improper question. You could take it up with the</p>	<p style="text-align: right;">Page 24</p> <p>1 A. ABU HBDA</p> <p>2 MS. KROPP: Why don't you answer the</p> <p>3 question?</p> <p>4 MR. SINAIKO: Can the reporter please</p> <p>5 repeat the question?</p> <p>6 (Whereupon, the requested portion was read</p> <p>7 back by the reporter.)</p> <p>8 A. Yes. Ms. Kropf. No.</p> <p>9 Q. Okay. And how did you come to be</p> <p>10 introduced to Ms. Kropf?</p> <p>11 A. Through the --</p> <p>12 THE INTERPRETER: I'm sorry.</p> <p>13 A. Through the Internet.</p> <p>14 Q. Mr. Abu Hbda, is it the case that you</p> <p>15 located Ms. Kropf and hired her as your lawyer on</p> <p>16 your own?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And are you paying Ms. Kropf out of</p> <p>19 your own funds, sir?</p> <p>20 MS. KROPP: Objection.</p> <p>21 Q. You may answer.</p> <p>22 MS. KROPP: No, he's not going to answer</p> <p>23 that, Steve. It's not relevant. It gets into the</p> <p>24 attorney-client.</p> <p>25 MR. SINAIKO: Relevance is not a basis for</p>
<p style="text-align: right;">Page 23</p> <p>1 A. ABU HBDA</p> <p>2 Judge.</p> <p>3 MR. SINAIKO: I don't want this to be a</p> <p>4 contentious deposition. The question is not a</p> <p>5 privilege question. Relevance objections are not</p> <p>6 an appropriate basis to instruct a witness not to</p> <p>7 answer. The Witness should answer the question.</p> <p>8 MS. KROPP: You're asking --</p> <p>9 MR. SINAIKO: Are you instructing him not</p> <p>10 to answer based on relevance?</p> <p>11 MS. KROPP: Are you asking him whether or</p> <p>12 not he has spoken to me, an attorney, before he</p> <p>13 received the Subpoena?</p> <p>14 MR. SINAIKO: That's exactly what I'm</p> <p>15 asking. Did he have any contact with you, in</p> <p>16 advance of receiving the Subpoena; that's what I'm</p> <p>17 asking.</p> <p>18 MS. KROPP: As long as you limit your</p> <p>19 answer to that.</p> <p>20 I think we're getting into dangerous</p> <p>21 territory, whether or not he worked with me</p> <p>22 before, or whether or not he'd spoken to me before</p> <p>23 is really not relevant.</p> <p>24 MR. SINAIKO: I'm feeling pretty safe, so</p> <p>25 the Witness can answer the question.</p>	<p style="text-align: right;">Page 25</p> <p>1 A. ABU HBDA</p> <p>2 an instruction not to answer, and the questions as</p> <p>3 to issuance and payments of bills is absolutely</p> <p>4 not privileged. I'm not asking for any</p> <p>5 communications between you and he. I asked for</p> <p>6 the arrangement between you and he, with respect</p> <p>7 to payment of bills, and whether he's paying them;</p> <p>8 that is not a privilege question.</p> <p>9 MS. KROPP: Your arrangement --</p> <p>10 MR. SINAIKO: If you're going to instruct</p> <p>11 him on things like that, we're going to have to go</p> <p>12 to the Judge, which I'd rather not do.</p> <p>13 MS. KROPP: The arrangement we have is in</p> <p>14 writing. It's a communication between us.</p> <p>15 I instruct you not to answer.</p> <p>16 If you want to call the Judge, I invite</p> <p>17 you to do so. It goes to the attorney-client</p> <p>18 privilege written engagement letter, and I'm</p> <p>19 instructing him not to answer.</p> <p>20 MR. SINAIKO: The relationship of his with</p> <p>21 you is not privileged. The communications with</p> <p>22 you is privileged. Let me see if I could put --</p> <p>23 slightly ask the question. I don't want to have</p> <p>24 to go to the Judge, and this is going to take</p> <p>25 longer.</p>

<p style="text-align: right;">Page 26</p> <p>1 A. ABU HBDA</p> <p>2 Q. Mr. Abu Hbda, are you personally paying</p> <p>3 the bills that Ms. Kropf issues for her services in</p> <p>4 connection with this matter?</p> <p>5 MS. KROPF: And I object, and I am</p> <p>6 instructing him not to answer. If you want to</p> <p>7 call the Court, Steve, then let's go ahead and</p> <p>8 stop, and why don't we go ahead and take care of</p> <p>9 it.</p> <p>10 MR. SINAICO: I mean, really, this is</p> <p>11 improper. We're going to put a pin in it, and</p> <p>12 we're going to come back to it, if we have to.</p> <p>13 This is not a proper objection. If we have to go</p> <p>14 to the Judge, or go to Mr. Abu Hbda, you know,</p> <p>15 because of this kind of thing, I would hate to do</p> <p>16 it, but we will have to, if we will. Okay.</p> <p>17 Q. Okay. You mentioned before, Mr. Abu Hbda,</p> <p>18 you reviewed certain documents in anticipation of</p> <p>19 your deposition. Do you remember more specifically</p> <p>20 what those documents were?</p> <p>21 A. Okay. Power of Attorney for my client.</p> <p>22 Q. And what is the nature of these Powers of</p> <p>23 Attorney that you mentioned?</p> <p>24 A. Services for -- for the people from my --</p> <p>25 from my back home, from my community.</p>	<p style="text-align: right;">Page 28</p> <p>1 A. ABU HBDA</p> <p>2 2.</p> <p>3 (Whereupon, Tab 1 was marked as Exhibit 2 for</p> <p>4 identification, as of April 7th, 2021.)</p> <p>5 THE INTERPRETER: Excuse me, can we go off</p> <p>6 record? Can I ask you if we could go off record?</p> <p>7 It's now --</p> <p>8 MR. SINAICO: Sure. If we need to go off</p> <p>9 the record for a moment, we could do that.</p> <p>10 THE INTERPRETER: Yeah. Can I talk to</p> <p>11 you?</p> <p>12 THE VIDEOGRAPHER: Okay. Does everyone</p> <p>13 agree to go off the record?</p> <p>14 MS. KROPF: Yup.</p> <p>15 THE VIDEOGRAPHER: Okay. We are now off</p> <p>16 the record. The time is 14:40 UTC Time.</p> <p>17 (Whereupon, a short recess was taken.)</p> <p>18 THE VIDEOGRAPHER: We are now back on the</p> <p>19 record. The time is 14:45 UTC Time.</p> <p>20 Q. Mr. Abu Hbda, can you see Exhibit 2?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And do you recognize this document?</p> <p>23 And by the way, if you want to page through it, we</p> <p>24 can page through it.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. ABU HBDA</p> <p>2 Q. You mean your community here in the United</p> <p>3 States?</p> <p>4 A. Yes.</p> <p>5 Q. And are these Powers of Attorney with</p> <p>6 respect to business dealings outside the United</p> <p>7 States?</p> <p>8 THE INTERPRETER: Excuse me, could you</p> <p>9 please repeat?</p> <p>10 MR. SINAICO: Sure. Let me put the</p> <p>11 question a second time.</p> <p>12 Q. Are these Powers of Attorney you</p> <p>13 mentioned, Mr. Abu Hbda, with respect to matters</p> <p>14 outside the United States?</p> <p>15 A. They were special -- they were cases</p> <p>16 special for my client.</p> <p>17 Q. Okay.</p> <p>18 MR. SINAICO: Okay. Cosette, could we</p> <p>19 bring up Tab 1, please?</p> <p>20 MS. VINCENT: Yeah.</p> <p>21 MR. SINAICO: Let's mark Tab 1, the</p> <p>22 document, you know -- let's mark that as our next</p> <p>23 exhibit, Exhibit 2, a six-page document that we</p> <p>24 printed from a Website titled,</p> <p>25 "Palestiniandocs.com"; let's mark that as Exhibit</p>	<p style="text-align: right;">Page 29</p> <p>1 A. ABU HBDA</p> <p>2 Q. And just to be clear, Mr. Abu Hbda, you</p> <p>3 recognize the document; is that correct?</p> <p>4 A. Yes.</p> <p>5 Q. And what do you recognize this document to</p> <p>6 be, Exhibit 2?</p> <p>7 A. It's from the Website, from my computer --</p> <p>8 from the computer.</p> <p>9 Q. And this Website is a website that is --</p> <p>10 well, let me withdraw that.</p> <p>11 Is this Website something that you</p> <p>12 created, or that was created under your direction,</p> <p>13 sir?</p> <p>14 A. Yes, for me.</p> <p>15 Q. And what is the purpose of the Website</p> <p>16 from which we drew Exhibit 2?</p> <p>17 A. Advertising. Advertisement.</p> <p>18 Q. And let's turn to -- actually, hang on one</p> <p>19 second. I want to page through the document.</p> <p>20 MR. SINAICO: Cosette, could you turn us</p> <p>21 to the last page of the document, please?</p> <p>22 Q. Okay. I'm looking. Do you see the last</p> <p>23 box on the page of the document of Exhibit 2?</p> <p>24 A. Now, I can see it.</p> <p>25 Q. Okay. And you see that it says, "Awni Abu</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. ABU HBDA</p> <p>2 Hbda Documentation Services"; do you see that?</p> <p>3 A. Yes. Yes.</p> <p>4 Q. And is that the name of your business,</p> <p>5 sir?</p> <p>6 A. It's part of my business, yes.</p> <p>7 Q. Okay. And is Awni Abu Hbda Documentation</p> <p>8 Services organized as a corporation, or some other</p> <p>9 sort of legal entity?</p> <p>10 A. It's a -- only my own. It's for my --</p> <p>11 yeah, mine person.</p> <p>12 Q. Okay. So, is it organized as a</p> <p>13 corporation, or a limited liability company, or</p> <p>14 anything like that?</p> <p>15 A. No. No.</p> <p>16 Q. Okay. And so would it be fair to say that</p> <p>17 Awni Abu Hbda Documentation Services is a business</p> <p>18 name that you use yourself, sir?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. When did you start Awni Abu Hbda</p> <p>21 Documentation Services?</p> <p>22 A. I don't recall; maybe a year, or a year</p> <p>23 and a half.</p> <p>24 Q. So, you think, sir, that the business was</p> <p>25 funded in 2019 or 2020; is that correct?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Let's step back just half a step</p> <p>3 here, Mr. Abu Hbda.</p> <p>4 Could you please tell me your educational</p> <p>5 history, since you graduated high school?</p> <p>6 A. Paterson. So --</p> <p>7 THE INTERPRETER: Sorry.</p> <p>8 A. So, I took courses in community college in</p> <p>9 Paterson, but I didn't finish, and so I took some --</p> <p>10 THE INTERPRETER: Hold on, sorry --</p> <p>11 A. Yes, and I took some lecture on insurance,</p> <p>12 and I had my license. I had my license.</p> <p>13 MR. SINAICO: Okay. Let's take just a</p> <p>14 half a step backwards.</p> <p>15 Actually, Cosette, could you bring up Tab</p> <p>16 8, please, and let's mark it as Exhibit 3.</p> <p>17 Okay. And so we're marking Exhibit 3, a</p> <p>18 four-page excerpt, which we printed from the same</p> <p>19 Website from which we extracted Exhibit 2.</p> <p>20 (Whereupon, Tab 8 was marked as Exhibit 3 for</p> <p>21 identification, as of April 7th, 2021.)</p> <p>22 MR. SINAICO: I'll just ask Mr. Abu Hbda</p> <p>23 quickly --</p> <p>24 Q. Do you recognize this to be a page from</p> <p>25 the Website for your business?</p>
<p style="text-align: right;">Page 31</p> <p>1 A. ABU HBDA</p> <p>2 A. The Website maybe, yes.</p> <p>3 Q. Okay. But not the Website, the business</p> <p>4 itself. The business that is Awni Abu Hbda</p> <p>5 Documentation Services, when did you start that</p> <p>6 business?</p> <p>7 A. It wasn't the business.</p> <p>8 THE INTERPRETER: Okay. Okay.</p> <p>9 A. It -- before, it wasn't really a business.</p> <p>10 Before, I was not having paper. Before, I didn't</p> <p>11 have -- I haven't have a Website. I only had the</p> <p>12 Website maybe a year, or a year and a half ago.</p> <p>13 Before, I was doing only, like once week,</p> <p>14 or couple of like -- or couple of times a week. It</p> <p>15 wasn't really a business.</p> <p>16 Q. Okay. What was the nature of the</p> <p>17 activities that you were engaged in, Mr. Abu Hbda,</p> <p>18 that, you know, that you were doing once or twice a</p> <p>19 week, and that, apparently now is Awni Abu Hbda</p> <p>20 Documentation Services?</p> <p>21 A. I -- I am.</p> <p>22 THE INTERPRETER: Hold on. Okay.</p> <p>23 A. I am -- I am a notary public, and</p> <p>24 accountant since 1980, and I was doing insurance</p> <p>25 since 1980.</p>	<p style="text-align: right;">Page 33</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes.</p> <p>3 Q. And this is part of the Website that</p> <p>4 either you created, or which was created under your</p> <p>5 direction; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Let's turn to the second page. So,</p> <p>8 you see the second and third pages had some text</p> <p>9 that's titled, "Palestinian Traditions and American</p> <p>10 Freedoms Blend Perfectly in Paterson"; do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 Q. Is that text that you wrote, sir?</p> <p>14 A. No.</p> <p>15 Q. Okay. Is that text --</p> <p>16 That's text that you got from another</p> <p>17 source; is that right?</p> <p>18 THE INTERPRETER: Okay.</p> <p>19 A. It's another magazine. New Jersey</p> <p>20 magazine write it -- wrote it, not me.</p> <p>21 Q. Do you believe the information presented</p> <p>22 in this text is accurate?</p> <p>23 A. I don't know. They wrote it, not me.</p> <p>24 Q. Okay. But you posted it on your Website,</p> <p>25 correct?</p>

<p style="text-align: right;">Page 34</p> <p>1 A. ABU HBDA</p> <p>2 A. True.</p> <p>3 Q. Okay. Let's look at the first sentence.</p> <p>4 It says here, "Awni Abu Hbda came to the United</p> <p>5 States to improve his English skills"; do you see</p> <p>6 that? We could enlarge it, if that would be</p> <p>7 helpful.</p> <p>8 MR. SINAICO: Cosette, could you zoom in</p> <p>9 for us?</p> <p>10 THE INTERPRETER: Thank you.</p> <p>11 A. Yes, I do.</p> <p>12 Q. Okay. And so that statement is accurate,</p> <p>13 correct?</p> <p>14 A. Maybe it was -- it's 50 years ago.</p> <p>15 Q. Actually, that's -- that takes to the next</p> <p>16 sentence. It's -- looking at the next sentence --</p> <p>17 and I recognize this may have been written sometime</p> <p>18 ago -- it says, "Following in the footsteps of an</p> <p>19 older brother, Awni Abu Hbda, now 68, arrived in</p> <p>20 America in 1971"; do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And that's, in fact, when you arrived in</p> <p>23 America, sir; is that correct?</p> <p>24 A. I think; yes.</p> <p>25 Q. Okay. And the sentence goes on to say</p>	<p style="text-align: right;">Page 36</p> <p>1 A. ABU HBDA</p> <p>2 the Institute of Insurance?</p> <p>3 A. Cars, and real estate property, and</p> <p>4 casualty.</p> <p>5 Q. Were the purposes of these courses to help</p> <p>6 you learn about selling property and casualty</p> <p>7 insurance?</p> <p>8 A. I was learning how to sell insurance.</p> <p>9 Q. Okay. And did you receive any sort of</p> <p>10 degree or certificate from the Institute of</p> <p>11 Insurance?</p> <p>12 A. I have New Jersey license.</p> <p>13 Q. Okay. We'll come back to that in just a</p> <p>14 moment.</p> <p>15 Apart from the Institute of Insurance and</p> <p>16 College in Paterson, have you taken any course at</p> <p>17 any institution in the United States?</p> <p>18 A. No.</p> <p>19 Q. Okay. Now, you mentioned a moment ago</p> <p>20 that you are a notary public; do you recall that?</p> <p>21 A. Yes.</p> <p>22 Q. And in what state are you commissioned a</p> <p>23 notary public?</p> <p>24 A. New Jersey State.</p> <p>25 Q. Okay. And you mentioned that you have</p>
<p style="text-align: right;">Page 35</p> <p>1 A. ABU HBDA</p> <p>2 that you graduated from Birzeit University; is that</p> <p>3 correct?</p> <p>4 A. Well, I -- I went to that school, but I</p> <p>5 never graduated.</p> <p>6 Q. Okay. And so you never received a degree</p> <p>7 from Birzeit University; is that correct?</p> <p>8 A. No.</p> <p>9 Q. Have you ever received any degree from any</p> <p>10 university?</p> <p>11 A. No. No.</p> <p>12 Q. Do you have a high school degree, sir?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And you mentioned that you</p> <p>15 attended -- in the United States, you attended some</p> <p>16 classes at a community college at Paterson, New</p> <p>17 Jersey; do you recall that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Apart from the community college in</p> <p>20 Paterson, New Jersey, have you ever taken classes at</p> <p>21 any other educational institution in the United</p> <p>22 States?</p> <p>23 A. Okay. Institute of Insurance for houses,</p> <p>24 car, and life.</p> <p>25 Q. And what sorts of classes did you take at</p>	<p style="text-align: right;">Page 37</p> <p>1 A. ABU HBDA</p> <p>2 some sort of an insurance license; do you recall</p> <p>3 that?</p> <p>4 A. I used --</p> <p>5 THE INTERPRETER: Okay.</p> <p>6 A. I used to have; not now.</p> <p>7 Q. Okay. And when did you get the insurance</p> <p>8 license?</p> <p>9 A. I don't recall, but I think 1980.</p> <p>10 Q. And you don't currently have the license,</p> <p>11 correct?</p> <p>12 A. No.</p> <p>13 Q. When did the license expire?</p> <p>14 A. I don't recall; maybe 1995, '96. I don't</p> <p>15 recall.</p> <p>16 Q. Apart from the insurance license, and the</p> <p>17 Notary Public Commission that you hold from the</p> <p>18 State of New Jersey, do you hold any other licenses</p> <p>19 or certificates from any government authority, you</p> <p>20 know, other than the State of New Jersey, anywhere</p> <p>21 in the world?</p> <p>22 A. No.</p> <p>23 MR. SINAICO: Okay. Let's -- if we could,</p> <p>24 Cosette, could you take us back to the first page</p> <p>25 of Exhibit 3, and let's zoom in at the top of the</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. ABU HBDA</p> <p>2 page. I don't think we have the top of the page.</p> <p>3 We're missing the top of the page. Could you zoom</p> <p>4 in? There you go. Could we zoom in on the</p> <p>5 Internet address?</p> <p>6 Q. Mr. Abu Hbda, do you see that the Internet</p> <p>7 address for the Website that you use for your</p> <p>8 business is, "Palestiniandocs.com"?</p> <p>9 A. Yes.</p> <p>10 THE INTERPRETER: Sorry.</p> <p>11 Q. And is that an Internet name that you</p> <p>12 selected?</p> <p>13 A. Yes.</p> <p>14 Q. How did you come to select that name for</p> <p>15 your business?</p> <p>16 A. It's a business name; nothing else.</p> <p>17 Q. All right. I'm just asking why you chose</p> <p>18 that name.</p> <p>19 A. It's a business name, that's all.</p> <p>20 Q. Was there any particular reason that you</p> <p>21 chose that name, as opposed to some other name?</p> <p>22 A. There is no reason.</p> <p>23 Q. Do you specialize, or does your business</p> <p>24 have a specialty in dealing with Palestinian</p> <p>25 documents?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: Okay. Okay.</p> <p>3 A. I'm a notary public who is witness to</p> <p>4 either Palestinian, or somebody else who -- who --</p> <p>5 who witness and sign the paper for everybody, and</p> <p>6 send paper to either the Palestinian Embassy, or</p> <p>7 other embassies.</p> <p>8 Q. Okay. So, one of the -- sir --</p> <p>9 Is it fair to say, sir, that one of the</p> <p>10 services that you offer through your business is the</p> <p>11 submission of documents on behalf of your clients,</p> <p>12 to the Palestinian Authority?</p> <p>13 THE INTERPRETER: Okay. Okay.</p> <p>14 A. No, I only send it to the Embassy if --</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. I don't send -- usually, I -- I don't --</p> <p>17 usually, I don't send the paper to the Embassy. I</p> <p>18 only send the paper if -- if the person ask me. I</p> <p>19 don't know how to send to the Embassy. Usually, I</p> <p>20 don't do it.</p> <p>21 Q. Okay. So, one of the --</p> <p>22 Is it fair to say, sir, that one of the</p> <p>23 services --</p> <p>24 MR. BERGER: Excuse me, I'm going to</p> <p>25 object to the translation. We all heard the</p>
<p style="text-align: right;">Page 39</p> <p>1 A. ABU HBDA</p> <p>2 A. No.</p> <p>3 Q. In your business, do you frequently deal</p> <p>4 with documents that are either being submitted to,</p> <p>5 or being issued by the Palestinian government --</p> <p>6 actually, I withdraw the question. Let me ask the</p> <p>7 question again.</p> <p>8 Do you specialize, or does your business</p> <p>9 have a specialty, in dealing with documents issued</p> <p>10 by the Palestinian Authority?</p> <p>11 A. No.</p> <p>12 Q. In your business, do you frequently deal</p> <p>13 with documents that are being submitted to or were</p> <p>14 issued by the Palestinian Authority?</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. I -- I -- I witness -- I witness notary</p> <p>17 public to everybody.</p> <p>18 THE INTERPRETER: I'm sorry.</p> <p>19 A. Everyone, from everywhere -- from --</p> <p>20 from -- I witness notary public for everybody from</p> <p>21 everywhere around the world.</p> <p>22 Q. Okay. Do you deal --</p> <p>23 In your business, sir, do you deal with</p> <p>24 documents that are being submitted to the</p> <p>25 Palestinian Authority?</p>	<p style="text-align: right;">Page 41</p> <p>1 A. ABU HBDA</p> <p>2 answer in English. The translation has generally</p> <p>3 been terrible. We heard the answer in English.</p> <p>4 It's on the videotape. The word, "usual," was</p> <p>5 never used.</p> <p>6 MR. SINAIKO: I'm going to say, Mr. Abu</p> <p>7 Hbda requested a translator today. I assume he</p> <p>8 took the position that his English is not able to</p> <p>9 testify today. Mr. Abu Hbda's English is pretty</p> <p>10 good. He seems to understand my questions well.</p> <p>11 He often starts to answer them before the</p> <p>12 translator has finished translating, and my</p> <p>13 question is, why did we go -- I mean, if Abu Hbda</p> <p>14 is able to answer questions in English, why do we</p> <p>15 have a translator here today? That's a question</p> <p>16 for Ms. Kropf.</p> <p>17 MS. KROPF: If you recall, Steve, we</p> <p>18 started the deposition by saying why doesn't he</p> <p>19 answer the questions in English, and he translated</p> <p>20 the answer, and we started with that process, and</p> <p>21 you said it was smoother to have him answer, and</p> <p>22 have her translate in English.</p> <p>23 My suggestion is, why don't I talk to</p> <p>24 Mr. Abu Hbda, and see how it's going, and see this</p> <p>25 process before, and see how it's working.</p>

<p style="text-align: right;">Page 42</p> <p>1 A. ABU HBDA</p> <p>2 I take your point. It's your deposition.</p> <p>3 We suggested the translator in case there were any</p> <p>4 issues, but my suggestion was that he answered in</p> <p>5 English. I thought you said it was smoother if he</p> <p>6 answered in Arabic.</p> <p>7 MR. SINAIKO: Actually, I -- the court</p> <p>8 reporter explained, and I agree, there has to be a</p> <p>9 consistent way that we're doing this. It's not</p> <p>10 possible for us to rely on translations of the</p> <p>11 questions, and answers in English. Like, either</p> <p>12 it's a translated deposition, or it's not a</p> <p>13 translated deposition.</p> <p>14 And if we're going to have him testify in</p> <p>15 English, which I, actually, having now watched</p> <p>16 this unfold for a while now, because I'm sort of</p> <p>17 learning a little bit myself about Mr. Abu Hbda's</p> <p>18 English skills, it seems to me that he understands</p> <p>19 pretty well, and, you know, given his background,</p> <p>20 he's been in the United States for 50 years, it's</p> <p>21 not surprising that he understands pretty well.</p> <p>22 If you want to take a break, that's fine,</p> <p>23 and if you want to make sure it makes sense to</p> <p>24 continue with the translator, or whether we ought</p> <p>25 to -- ought to excuse the translator and continue</p>	<p style="text-align: right;">Page 44</p> <p>1 A. ABU HBDA</p> <p>2 He's saying something in Arabic, and he</p> <p>3 was saying something in English, and I have to say</p> <p>4 both, so that's why I was translating both; that's</p> <p>5 what I did.</p> <p>6 MR. SINAIKO: Understood. That's actually</p> <p>7 one of the things that we have to work out here,</p> <p>8 whether it makes sense to have the translated</p> <p>9 deposition, whether Mr. Abu Hbda's skills -- it's</p> <p>10 more sensible, and more efficient to just proceed</p> <p>11 in English. So, why don't we go off the record.</p> <p>12 We'll resume at 11:35, and we'll figure out how to</p> <p>13 handle this.</p> <p>14 THE VIDEOGRAPHER: Okay. We're now off</p> <p>15 the record. The time is 15:22 UTC Time.</p> <p>16 (Whereupon, a short recess was taken.)</p> <p>17 THE VIDEOGRAPHER: We are now back on the</p> <p>18 record. The time is 15:39 UTC Time.</p> <p>19 MR. SINAIKO: So, before we resume the</p> <p>20 examination of Mr. Abu Hbda, I just want to</p> <p>21 summarize the conversation that Ms. Kropf and I</p> <p>22 had off the record, which is that, although</p> <p>23 Mr. Abu Hbda's English skills are pretty good,</p> <p>24 Ms. Kropf informed me that Mr. Abu Hbda is more</p> <p>25 comfortable having a translator on the call for</p>
<p style="text-align: right;">Page 43</p> <p>1 A. ABU HBDA</p> <p>2 the deposition after the break in English only.</p> <p>3 MS. KROPF: I would like to talk to my</p> <p>4 client about that because there's a comfort point</p> <p>5 here, you know -- because you're going to ask</p> <p>6 questions that are probably technical. The words</p> <p>7 are very much going to matter, and I don't know</p> <p>8 how he feels about the translation. So, why don't</p> <p>9 we take a 15-minute break, and I'll talk to him,</p> <p>10 and if you want to, you know, the counsel can talk</p> <p>11 offline as well.</p> <p>12 MR. SINAIKO: Sure. So, it's 11:21 now,</p> <p>13 according to my clock. Why don't we plan to</p> <p>14 resume ourselves at -- you want to resume at</p> <p>15 11:45?</p> <p>16 MS. KROPF: I don't know if we need that</p> <p>17 long.</p> <p>18 MR. SINAIKO: We don't need that much</p> <p>19 time.</p> <p>20 MS. KROPF: I think 15 minutes is 11:35.</p> <p>21 MR. SINAIKO: That's perfect. Why don't</p> <p>22 we go off the record and resume at 11:35.</p> <p>23 THE VIDEOGRAPHER: We're off the record --</p> <p>24 THE INTERPRETER: I want to say something</p> <p>25 in English, and this is --</p>	<p style="text-align: right;">Page 45</p> <p>1 A. ABU HBDA</p> <p>2 which reason, we're going to, at least for the</p> <p>3 time being, continue using the translator, and we</p> <p>4 could continue to reevaluate that as we move</p> <p>5 forward; is that fair, Ms. Kropf?</p> <p>6 MS. KROPF: That's correct. Thanks,</p> <p>7 Steve.</p> <p>8 MR. SINAIKO: Okay.</p> <p>9 Q. I think we were looking at --</p> <p>10 MR. SINAIKO: Okay. Let's go back to</p> <p>11 Exhibit 3.</p> <p>12 And Cosette, could we go to Page 2,</p> <p>13 please? And could we zoom in on the one, two --</p> <p>14 third paragraph.</p> <p>15 Q. All right. Mr. Abu Hbda, can you see the</p> <p>16 third paragraph of that text that's, you know, part</p> <p>17 of the Exhibit 3?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And I'm looking at the second --</p> <p>20 the second sentence of Paragraph 3. It says that</p> <p>21 you studied business and political science at</p> <p>22 Passaic County Community College, and William</p> <p>23 Paterson Community College; is that correct?</p> <p>24 A. It's just some --</p> <p>25 MR. SINAIKO: I'm just going to note for</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. ABU HBDA</p> <p>2 the record that, you know, in response to my</p> <p>3 question, Mr. Abu Hbda immediately began answering</p> <p>4 in English, and his answer was perfectly</p> <p>5 intelligible to me, but we should continue with</p> <p>6 the translation.</p> <p>7 A. Yeah.</p> <p>8 Q. Sir, is it accurate that you took business</p> <p>9 and political science classes at Passaic County</p> <p>10 Community College?</p> <p>11 A. Yes.</p> <p>12 Q. And is that the community college in</p> <p>13 Paterson, New Jersey that you mentioned earlier in</p> <p>14 your testimony today, sir?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And William Paterson University,</p> <p>17 that's not the college that you mentioned earlier;</p> <p>18 is that right?</p> <p>19 A. No.</p> <p>20 Q. Okay. But you did take classes at William</p> <p>21 Paterson University, in addition to the college in</p> <p>22 Paterson, New Jersey, and in addition to the</p> <p>23 Institution of Insurance, correct?</p> <p>24 A. In William Paterson, and I -- I took --</p> <p>25 it's -- I took a couple of lecture with -- for</p>	<p style="text-align: right;">Page 48</p> <p>1 A. ABU HBDA</p> <p>2 lost"; do you see that?</p> <p>3 THE INTERPRETER: Counselor, I don't see</p> <p>4 it.</p> <p>5 MR. SINAIKO: Sure. We're in the second</p> <p>6 paragraph on the page. There's a one-line</p> <p>7 paragraph, and a second paragraph, and we're</p> <p>8 looking at the second sentence, which says, "Awni</p> <p>9 Abu Hbda made a run for the City Council in 1984</p> <p>10 but lost."</p> <p>11 THE INTERPRETER: Yes. Okay.</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And is that statement accurate?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And let me just go to -- let me go</p> <p>16 to the fourth paragraph down, the one that starts,</p> <p>17 "Today political candidates," and the first line of</p> <p>18 the paragraph, second sentence says, "In addition to</p> <p>19 servicing as Paterson's Deputy Mayor"; do you see</p> <p>20 that.</p> <p>21 MR. SINAIKO: The first sentence says, "In</p> <p>22 addition to," -- the second sentence says, "In</p> <p>23 addition to servicing as Paterson Deputy Mayor."</p> <p>24 THE INTERPRETER: Thank you.</p> <p>25 MR. SINAIKO: We're actually focusing on</p>
<p style="text-align: right;">Page 47</p> <p>1 A. ABU HBDA</p> <p>2 insurance, not credits.</p> <p>3 Q. Okay. Now that we've clarified that you</p> <p>4 took classes at William Paterson University, in</p> <p>5 addition to the Institute of Insurance, and the</p> <p>6 College at William Paterson, does that refresh your</p> <p>7 recollection of any other institution in the United</p> <p>8 States where you studied?</p> <p>9 THE INTERPRETER: Can you repeat that?</p> <p>10 MR. SINAIKO: Can the court reporter read</p> <p>11 back the question, please?</p> <p>12 (Whereupon, the requested portion was read</p> <p>13 back by the reporter.)</p> <p>14 A. I don't recall.</p> <p>15 Q. Okay.</p> <p>16 THE VIDEOGRAPHER: Can I just ask Mr. Abu</p> <p>17 Hbda to keep his face in the screen? Your mouth</p> <p>18 is cut off. Thank you. Thank you.</p> <p>19 MR. SINAIKO: Let's go to the next page of</p> <p>20 Exhibit 3. And can we zero in on the second</p> <p>21 paragraph at the top? There's the one-liner, and</p> <p>22 then there's the second paragraph.</p> <p>23 Q. All right. Mr. Abu Hbda, do you see that</p> <p>24 in the second paragraph, the Article says, "Awni Abu</p> <p>25 Hbda made a run for the City Counsel in 1984 but</p>	<p style="text-align: right;">Page 49</p> <p>1 A. ABU HBDA</p> <p>2 the next sentence, actually --</p> <p>3 Q. Actually, let me withdraw the question.</p> <p>4 Now that the translating is focusing on</p> <p>5 what I'm focusing on, let me just put the question</p> <p>6 again.</p> <p>7 A. Yes.</p> <p>8 Q. Mr. Abu Hbda, on the second page of</p> <p>9 Exhibit 3, in the fourth paragraph, do you see that</p> <p>10 it says, "In addition to servicing as Paterson's</p> <p>11 Deputy Mayor an additional" --</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Is it, in fact, the case you served</p> <p>14 as Paterson's Deputy Mayor?</p> <p>15 A. Yes.</p> <p>16 Q. And when did you serve as Paterson's</p> <p>17 Deputy Mayor?</p> <p>18 A. 2002 to 2010.</p> <p>19 Q. Okay. And have you ever held any title,</p> <p>20 or -- well, let me withdraw that.</p> <p>21 Have you ever held any title under any</p> <p>22 other -- under any other government, apart from</p> <p>23 Paterson, New Jersey?</p> <p>24 A. New Jersey -- in Paterson Commissioner,</p> <p>25 but not in New Jersey.</p>

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<p style="text-align: right;">Page 50</p> <p>1 A. ABU HBDA</p> <p>2 Q. I'm sorry, can you --</p> <p>3 A. In Paterson, Commissioner comments --</p> <p>4 Commissioner Institutes of Paterson. Commissioner</p> <p>5 Institutes of Paterson.</p> <p>6 Q. Okay. Mr. Abu Hbda, was your answer a</p> <p>7 moment ago that you also served as some sort of a</p> <p>8 Commissioner in Paterson, New Jersey?</p> <p>9 A. Yes.</p> <p>10 Q. We should wait for the translator to</p> <p>11 answer for you, and then would you answer --</p> <p>12 By the way, let's get through this</p> <p>13 question and we'll come back.</p> <p>14 MR. SINAIKO: Could the court reporter</p> <p>15 read back the question, please?</p> <p>16 (Whereupon, the requested portion was read</p> <p>17 back by the reporter.)</p> <p>18 A. I used to be Commissioner of the institute</p> <p>19 of Paterson.</p> <p>20 Q. Sir, is it accurate that you were a --</p> <p>21 that you held the title of Commissioner of the City</p> <p>22 of Paterson, New Jersey -- you were one of the --</p> <p>23 withdrawn.</p> <p>24 Is it accurate, sir, that you held the</p> <p>25 title Commissioner in the City of Paterson, and that</p>	<p style="text-align: right;">Page 52</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay.</p> <p>3 MR. SINAIKO: Cosette, let's bring up Tab</p> <p>4 2, please. And I would like to mark this as our</p> <p>5 next exhibit; I think it's going to be Exhibit 4.</p> <p>6 (Whereupon, Tab 2 was marked as Exhibit 4 for</p> <p>7 identification, as of April 7th, 2021.)</p> <p>8 MR. SINAIKO: Cosette?</p> <p>9 MS. VINCENT: Yes. Bringing it up.</p> <p>10 MR. SINAIKO: Please. Okay. Thank you.</p> <p>11 So, I would like to mark for identification as</p> <p>12 Exhibit 4 a three-page excerpt from Mr. Abu Hbda's</p> <p>13 Website, and --</p> <p>14 Q. And I would ask you, Mr. Abu Hbda, can you</p> <p>15 see the document?</p> <p>16 A. Yes.</p> <p>17 Q. And do you recognize this to be an excerpt</p> <p>18 for the Website that you obtained for your business?</p> <p>19 A. Yes.</p> <p>20 Q. And this page of your Website was prepared</p> <p>21 by you or under your direction, correct?</p> <p>22 A. Yes, I -- I -- yes, I took it, but it</p> <p>23 wasn't me who prepared.</p> <p>24 Q. So, it wasn't you who prepared -- oh, I'm</p> <p>25 sorry. Let me withdraw that.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. ABU HBDA</p> <p>2 you were one of a number of Commissioners in that</p> <p>3 city?</p> <p>4 A. I used to be the Commissioner, the</p> <p>5 Institute of Paterson, and the Library Boards.</p> <p>6 Q. Were those appointed commissions, or --</p> <p>7 withdrawn.</p> <p>8 Were those appointed positions or elected</p> <p>9 positions?</p> <p>10 A. It's appointed.</p> <p>11 Q. Okay. And apart from your positions in</p> <p>12 the City of Paterson as Deputy Mayor, and</p> <p>13 Commissioner, and the Library Board, have you ever</p> <p>14 held any other title with any government body?</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. With the government, no.</p> <p>17 Q. Okay. Have you ever held a title given to</p> <p>18 you by the Palestinian Authority?</p> <p>19 A. No.</p> <p>20 Q. Have you ever been an employee of the</p> <p>21 Palestinian Authority?</p> <p>22 A. No.</p> <p>23 Q. Have you ever held a title given to you by</p> <p>24 the Palestine Liberation Organization?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 53</p> <p>1 A. ABU HBDA</p> <p>2 Just to be clear, Mr. Abu Hbda, your</p> <p>3 testimony is that you didn't prepare the document,</p> <p>4 or you didn't prepare this document, but you checked</p> <p>5 its content and you agreed with its content,</p> <p>6 correct?</p> <p>7 A. Yes, I checked it and I agree on it. I</p> <p>8 agreed on it.</p> <p>9 MR. SINAIKO: Okay. Let's turn to Page 2</p> <p>10 of the document.</p> <p>11 Q. At the top of the page, Mr. Abu Hbda, do</p> <p>12 you see that it says, "Legalize You Documents"?</p> <p>13 THE INTERPRETER: I don't see it.</p> <p>14 MR. SINAIKO: At the top of the page, in</p> <p>15 the center, "Legalize You Documents"?</p> <p>16 THE INTERPRETER: Oh, yeah. Okay.</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And can you explain to us -- well,</p> <p>19 withdrawn.</p> <p>20 Is Legal -- is, "Legalize You Documents,"</p> <p>21 is that a service that you provide through Abu Hbda</p> <p>22 Documentation Services?</p> <p>23 A. Yes.</p> <p>24 Q. And can you describe to us what that</p> <p>25 service is exactly? When you say that one of the</p>

<p style="text-align: right;">Page 54</p> <p>1 A. ABU HBDA</p> <p>2 services you offer is, "Legalize You Documents,"</p> <p>3 what do you mean by that?</p> <p>4 A. I witness -- I witness -- I witness,</p> <p>5 and -- and notary -- about the paper of my client</p> <p>6 for the embassy, for the embassies.</p> <p>7 Q. Okay. And that -- and which embassies are</p> <p>8 those, sir?</p> <p>9 A. Any embassies in the world.</p> <p>10 Q. Does that include, in any way, any</p> <p>11 embassies with the Palestinian Authority?</p> <p>12 THE INTERPRETER: Could you please repeat,</p> <p>13 sorry? Excuse me.</p> <p>14 MR. SINAICO: Could the reporter please</p> <p>15 read back the question?</p> <p>16 (Whereupon, the requested portion was read</p> <p>17 back by the reporter.)</p> <p>18 Q. When you mentioned, Mr. Abu Hbda, any</p> <p>19 embassies in the world, does that include any</p> <p>20 embassies that are in any way associated with the</p> <p>21 Palestinian Authority?</p> <p>22 A. For the Palestinian Embassy will ask</p> <p>23 people to send their paper to the Embassy.</p> <p>24 Q. Okay. So, to go back to the question, the</p> <p>25 answer is, I think what you were saying, sir, is</p>	<p style="text-align: right;">Page 56</p> <p>1 A. ABU HBDA</p> <p>2 skills are obviously less, you know -- less sharp</p> <p>3 than those of your check translator. In any</p> <p>4 event, let me just try to put this question again.</p> <p>5 Q. When you say, Mr. -- when you say,</p> <p>6 Mr. Abu Hbda that -- let me -- let me withdraw that</p> <p>7 question.</p> <p>8 Going back to the top of the center of</p> <p>9 Page 2 of Exhibit 4 where it says, "Legalize You</p> <p>10 Documents," is it correct, sir, that the service of,</p> <p>11 "Legalize You Documents," involves witnessing and</p> <p>12 notarizing new signatures on documents?</p> <p>13 THE INTERPRETER: Okay.</p> <p>14 A. Most of the time, yes. Sometimes there is</p> <p>15 no signature.</p> <p>16 Q. Okay. And when there is no signature,</p> <p>17 what does the process of Legalize You Document</p> <p>18 involve?</p> <p>19 THE INTERPRETER: Okay.</p> <p>20 A. So, when there is --</p> <p>21 THE INTERPRETER: Hold on. One.</p> <p>22 A. When there is a certificate, a course</p> <p>23 certificate, or a Ph.D., or a death certificate, or</p> <p>24 a school certificate, or a divorce, or university</p> <p>25 certificate, we -- we -- we don't sign, we -- we</p>
<p style="text-align: right;">Page 55</p> <p>1 A. ABU HBDA</p> <p>2 that the answer to the question is, yes, that the</p> <p>3 documents in question are prepared for use, you</p> <p>4 know, or submission to embassies affiliated in some</p> <p>5 way with the Palestinian Authority; is that correct?</p> <p>6 MR. BERGER: Objection, that</p> <p>7 mischaracterizes his testimony.</p> <p>8 Q. Okay. You may answer, Mr. Abu Hbda.</p> <p>9 Actually, I apologize. Let me withdraw the</p> <p>10 question.</p> <p>11 You testified a moment ago, Mr. Abu Hbda,</p> <p>12 that you witness documents for the embassies, and I</p> <p>13 asked you whether that -- the embassies included any</p> <p>14 embassies that included in any way any embassies</p> <p>15 associated with the Palestinian Authority?</p> <p>16 MR. BERGER: Objection; that's not what he</p> <p>17 said.</p> <p>18 MR. SINAICO: I'm reading from the</p> <p>19 realtime.</p> <p>20 MR. BERGER: You're using the word, "for,"</p> <p>21 in a way that the translator didn't mean. I could</p> <p>22 tell you that because we have a check translator</p> <p>23 here.</p> <p>24 MR. SINAICO: I see. I can't say what the</p> <p>25 translator knows or doesn't know. My Arabic</p>	<p style="text-align: right;">Page 57</p> <p>1 A. ABU HBDA</p> <p>2 don't sign it. We sign it --</p> <p>3 THE INTERPRETER: Okay.</p> <p>4 A. We sign it, and we send it to --</p> <p>5 THE INTERPRETER: Okay.</p> <p>6 A. Okay. Either people they will send it to</p> <p>7 the Embassy, or we send it to the Embassy.</p> <p>8 Q. Okay. So, that -- the service, "Legalize</p> <p>9 You Documents," as noted at the top of the second</p> <p>10 page of Exhibit 4, can involve you notarizing a</p> <p>11 signature, correct?</p> <p>12 THE INTERPRETER: Okay.</p> <p>13 A. So, when it's most -- yeah; when it's a</p> <p>14 paper coming from the Court, or from a -- when it's</p> <p>15 a legal paper, or it's a degree. So, we -- we</p> <p>16 consider it as a -- it's something legal. So, we</p> <p>17 consider it as something legal.</p> <p>18 Q. Okay. Let me go back to the question,</p> <p>19 Mr. Abu Hbda. The question is, does the service of</p> <p>20 Legalize You Documents noted at the top of the</p> <p>21 center of Page 2, Exhibit 4 include, in some</p> <p>22 instances, notarizing a signature? That's a simple</p> <p>23 question.</p> <p>24 THE INTERPRETER: Hold on. I'm sorry.</p> <p>25 I'm assume to go step by step because I cannot say</p>

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<p style="text-align: right;">Page 58</p> <p>1 A. ABU HBDA</p> <p>2 like that my translation has to be accurate.</p> <p>3 A. Okay. Some legal paper doesn't need to</p> <p>4 be -- doesn't need to be legalized.</p> <p>5 Q. Understood, understood. Let me step back</p> <p>6 for a moment, because we're getting a little off</p> <p>7 track here.</p> <p>8 In some instances, "Legalize You</p> <p>9 Documents," involves notarizing a signature; is that</p> <p>10 correct, sir? This is the service that's noted at</p> <p>11 the top of the page, correct, sir?</p> <p>12 A. If someone has a paper and we have to sign</p> <p>13 on it, yes.</p> <p>14 Q. Okay.</p> <p>15 A. The person has to sign the front of us,</p> <p>16 yes.</p> <p>17 MR. SINAIKO: I would just note again that</p> <p>18 Mr. Abu Hbda answered that question in English</p> <p>19 over the translator and, you know, in a perfectly</p> <p>20 coherent way. We're going to continue with the</p> <p>21 translator now, but I am concerned that this is an</p> <p>22 incredible waste of time, that the translator is</p> <p>23 acting ineffective here, and it's slowing down the</p> <p>24 deposition, but we could then --</p> <p>25 Q. New question. Is it correct that service</p>	<p style="text-align: right;">Page 60</p> <p>1 A. ABU HBDA</p> <p>2 certificate, or a death certificate, in that</p> <p>3 instance, you send the -- if the client asks you to</p> <p>4 you send the certificate to an Embassy -- I think</p> <p>5 you mentioned an Embassy -- and they put a stamp on</p> <p>6 it from a foreign government; is that correct?</p> <p>7 THE INTERPRETER: Could you say it step by</p> <p>8 step.</p> <p>9 MR. SINAIKO: Okay.</p> <p>10 THE INTERPRETER: Or I will read it from</p> <p>11 the transcript.</p> <p>12 Q. Let me try to ask the question in pieces</p> <p>13 slowly.</p> <p>14 When you are dealing -- instances when</p> <p>15 legalizing a document involves legalizing a death</p> <p>16 certificate; is that correct, Mr. Abu Hbda?</p> <p>17 A. Yes. Yes, and they will be free, if they</p> <p>18 want to sign it -- if they will sign it or not.</p> <p>19 Q. Okay. But whether or not the -- whether</p> <p>20 or not the client signs the document,</p> <p>21 legalization -- that -- what does legalization of a</p> <p>22 document like that entail?</p> <p>23 A. The person will go back to the -- to the</p> <p>24 --</p> <p>25 MR. SINAIKO: Once again, I'll note that</p>
<p style="text-align: right;">Page 59</p> <p>1 A. ABU HBDA</p> <p>2 of Legalize You Documents sometimes performs you</p> <p>3 witnessing the signature?</p> <p>4 A. Sometimes, yes, sometimes, no.</p> <p>5 Q. Okay. At times, it does, correct?</p> <p>6 THE INTERPRETER: Excuse me.</p> <p>7 Q. At times, it does, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And at times, "Legalize You</p> <p>10 Documents," involves documents that are not signed</p> <p>11 by your clients; is that correct, sir?</p> <p>12 THE INTERPRETER: I'm sorry, I'm just</p> <p>13 reading the question again.</p> <p>14 Okay.</p> <p>15 A. If it's a legal paper, no. If it's like a</p> <p>16 court, or a divorce, or a death -- death.</p> <p>17 Q. Okay. And in that -- in that instance --</p> <p>18 When we're talking about a document that</p> <p>19 is not signed by your client, is it correct, sir,</p> <p>20 that your service involved submitting that document</p> <p>21 to an authority for authentication or certification?</p> <p>22 A. I would send the paper, and they are free</p> <p>23 to sign it or not, either sign it or nothing.</p> <p>24 Q. Okay. When you're talking about, for</p> <p>25 example, authentication, or legalization of a birth</p>	<p style="text-align: right;">Page 61</p> <p>1 A. ABU HBDA</p> <p>2 Mr. Abu Hbda is assisting the translator, and</p> <p>3 translating, and speaking perfect English.</p> <p>4 A. The person will -- will go back to the --</p> <p>5 to the place where -- the person will -- will go</p> <p>6 back to the place, like whether they will sign it or</p> <p>7 not, the person will go back to the --</p> <p>8 THE INTERPRETER: Okay. Excuse me, I will</p> <p>9 translate it.</p> <p>10 A. The person will take the paper -- the</p> <p>11 person will take the paper.</p> <p>12 THE INTERPRETER: Okay.</p> <p>13 A. He will send it back to his home, back</p> <p>14 home.</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 A. And the -- the -- his back home is free to</p> <p>17 accept it, whether accept it or not.</p> <p>18 Q. And sometimes, Mr. Abu Hbda, you send the</p> <p>19 document, correct, rather than your client?</p> <p>20 A. If they ask me to do it, yes.</p> <p>21 Q. Okay. And when you send the document,</p> <p>22 what is the purpose of sending the document; what</p> <p>23 are you trying to get?</p> <p>24 A. To be -- to be signed by the -- by the</p> <p>25 embassy, or -- by the embassy or the -- by the</p>

<p style="text-align: right;">Page 62</p> <p>1 A. ABU HBDA</p> <p>2 embassy or the consulate.</p> <p>3 Q. To be signed by an official of a foreign</p> <p>4 government, correct, or stamp -- let me withdraw</p> <p>5 that.</p> <p>6 To be signed, or stamped, or -- let me</p> <p>7 withdraw that. I'm going to try one more time.</p> <p>8 When you send the documents to a foreign</p> <p>9 embassy, the purpose of that is to have them sign</p> <p>10 and/or stamp, or certified by an official of a</p> <p>11 foreign government; is that correct?</p> <p>12 A. They will.</p> <p>13 THE INTERPRETER: Okay.</p> <p>14 A. They will -- they will sign on the top of</p> <p>15 my signature. They're not responsible of the main</p> <p>16 contain of the paper.</p> <p>17 Q. Right. But the purpose of submitting the</p> <p>18 document to the foreign embassy is to obtain a</p> <p>19 signature or a stamp on the document from an</p> <p>20 official of the government whose embassy that is; is</p> <p>21 that correct?</p> <p>22 A. Yes; correct.</p> <p>23 Q. Okay. And one of the places to which you</p> <p>24 submit documents of this nature to get a signature,</p> <p>25 or a certification, or a stamp is the Palestinian</p>	<p style="text-align: right;">Page 64</p> <p>1 A. ABU HBDA</p> <p>2 affiliated with the Palestinian Authority, correct,</p> <p>3 sir?</p> <p>4 A. I only know that it represent -- it</p> <p>5 represent Palestinian, Palestinian people.</p> <p>6 Q. Okay. Staying on Page 2 of Exhibit 4, do</p> <p>7 you see, sir, that it says, "Passport Services"; do</p> <p>8 you see that, sir?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And would it be fair to say, sir,</p> <p>11 that, "Passport Services," involves the submission</p> <p>12 of applications to obtain or renew a passport?</p> <p>13 A. No.</p> <p>14 Q. No? Can you describe -- oh, sorry. Can</p> <p>15 you describe what, "Passport Services," means,</p> <p>16 please?</p> <p>17 A. Someone will come with that --</p> <p>18 THE INTERPRETER: Hold on.</p> <p>19 A. Someone will come --</p> <p>20 THE INTERPRETER: Hold on.</p> <p>21 A. Someone will come --</p> <p>22 THE INTERPRETER: Okay.</p> <p>23 A. Someone will come with his passport. We</p> <p>24 will do Power of Attorney from him to someone else.</p> <p>25 He will sign it in front of me.</p>
<p style="text-align: right;">Page 63</p> <p>1 A. ABU HBDA</p> <p>2 Authority; is that correct?</p> <p>3 A. No.</p> <p>4 Q. So, the answer is no, that's not correct?</p> <p>5 A. I don't send to them -- I don't send to</p> <p>6 the -- the Palestinian Authority. I send to people</p> <p>7 who represent the Palestinian Authority.</p> <p>8 MR. SINAICO: Okay. Once again, I'm going</p> <p>9 to note that Mr. Abu Hbda was assisting the</p> <p>10 translator, and translating his answer into</p> <p>11 English, and I'm going to go on to my next</p> <p>12 question, which is --</p> <p>13 Q. To the embassy which you send these papers</p> <p>14 in Canada, you understand that to be an embassy</p> <p>15 operated by the Palestinian Authority, correct?</p> <p>16 THE INTERPRETER: Can you please repeat</p> <p>17 the question.</p> <p>18 MR. SINAICO: Can the court reporter read</p> <p>19 the question back, please.</p> <p>20 (Whereupon, the requested portion was read</p> <p>21 back by the reporter.)</p> <p>22 A. Yeah, you -- it was -- it was writing</p> <p>23 that -- it was -- it was writing -- no, the title</p> <p>24 was Palestinian delegation.</p> <p>25 Q. Okay. You understand that embassy to be</p>	<p style="text-align: right;">Page 65</p> <p>1 A. ABU HBDA</p> <p>2 After that, I will sign it notary, and I</p> <p>3 will give -- I will give it to him, and he will send</p> <p>4 it to -- he will send it with whatever he wants.</p> <p>5 Q. Okay. So, your service, when you say,</p> <p>6 "Passport Services" -- pardon me.</p> <p>7 When you say, "Passport Services," on your</p> <p>8 Website here, Mr. Abu Hbda, the service you provide</p> <p>9 is notarizing a signature on a passport application;</p> <p>10 is that correct?</p> <p>11 THE INTERPRETER: Okay.</p> <p>12 A. I notarize -- I notarize his signature</p> <p>13 only. I notarize his signature only.</p> <p>14 Q. Okay. So, just to be clear, and to close</p> <p>15 this off, "Passport Services," involves the</p> <p>16 notarization of passport applicants on passport</p> <p>17 applications, correct?</p> <p>18 A. So, on the Passport Services, there is no</p> <p>19 application; there is only Power of Attorney.</p> <p>20 MR. SINAICO: Okay. I'm going to suggest</p> <p>21 it's 12:30 now. I'm going to suggest that we take</p> <p>22 our lunch break, and we resume at 1:30, if that's</p> <p>23 okay with everybody.</p> <p>24 MS. KROPP: Okay. That's fine. I don't</p> <p>25 know if we want to have a conversation about the</p>

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<p style="text-align: right;">Page 66</p> <p>1 A. ABU HBDA</p> <p>2 translation on the record or off the record.</p> <p>3 MR. SINAICO: I guess we could have a</p> <p>4 conversation about translation off the record, but</p> <p>5 after we have the conversation about translation</p> <p>6 off the record, we need to have the conversation</p> <p>7 on the record.</p> <p>8 MS. KROPF: That's fine.</p> <p>9 MR. SINAICO: Why don't Mr. Abu Hbda be</p> <p>10 excused, so he could have his lunch, And Counsel</p> <p>11 can have the conversation about translation, and</p> <p>12 we'll plan to resume at 1:34. Actually, you know</p> <p>13 what, I take it back. Let's plan to resume at</p> <p>14 1:34.</p> <p>15 THE VIDEOGRAPHER: Okay. We're now off</p> <p>16 the record. The time is 16:34 UTC Time.</p> <p>17 (Whereupon, a short recess was taken.)</p> <p>18 THE VIDEOGRAPHER: We are now back on the</p> <p>19 record. The time is 17:39 UTC Time.</p> <p>20 MR. SINAICO: I will just point out to</p> <p>21 everyone on the call, before we resume the</p> <p>22 examination of Mr. Abu Hbda, that we have a new</p> <p>23 translator now. The translator, maybe the new</p> <p>24 translator could identify himself by name and be</p> <p>25 sworn by the court reporter.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. ABU HBDA</p> <p>2 BY MR. SINAICO:</p> <p>3 Q. Mr. Abu Hbda, I hope you had a terrific</p> <p>4 lunch. Are you ready to resume?</p> <p>5 A. Yes.</p> <p>6 Q. Do we wait, the translate -- I don't --</p> <p>7 maybe you don't need the translator, but if the</p> <p>8 translator's here, we should use the translator.</p> <p>9 A. I'm ready.</p> <p>10 MR. SINAICO: Okay. Cosette, could we</p> <p>11 bring up -- could we bring up Tab 4, again,</p> <p>12 please?</p> <p>13 MS. VINCENT: Yes.</p> <p>14 MR. SINAICO: I'm sorry, I meant Tab 2,</p> <p>15 Exhibit 4.</p> <p>16 MS. VINCENT: I got you.</p> <p>17 MR. SINAICO: Done, and done.</p> <p>18 Q. Okay. We're going to stay on Page 2, and</p> <p>19 we're going to resume -- we're going to try to run</p> <p>20 back over some material we did before where we were</p> <p>21 having trouble with the translation; is that okay,</p> <p>22 Mr. Abu Hbda? Please, if we don't need the</p> <p>23 translator, we could excuse him, but if we need the</p> <p>24 translator --</p> <p>25 A. Yes, sir.</p>
<p style="text-align: right;">Page 67</p> <p>1 A. ABU HBDA</p> <p>2 THE INTERPRETER: Sure. My name is</p> <p>3 Sadeer; S-A-D-E-E-R; this is the first name. Al,</p> <p>4 A-L, space, Amiri, A-M-I-R-I, and it's written on</p> <p>5 the screen.</p> <p>6 - o o o -</p> <p>7</p> <p>8 H A D E E R A L A M I R I,</p> <p>9 Called as the interpreter in this</p> <p>10 matter, was duly sworn by a Notary Public to</p> <p>11 accurately and faithfully translate the</p> <p>12 questions propounded to the Awni Abu Hbda</p> <p>13 from English into Arabic, and the answers</p> <p>14 given by the Awni Abu Hbda from Arabic into</p> <p>15 English.</p> <p>16</p> <p>17 - o o o -</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 69</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. Returning to the top of the page.</p> <p>3 Do you see in the center of the page says, "Legalize</p> <p>4 You Documents"; do you see that, sir?</p> <p>5 A. Yes, I see it.</p> <p>6 Q. And, "Legalize You Documents," is one of</p> <p>7 the services that Awni Abu Hbda Documentation</p> <p>8 Services provides; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And can you describe the nature of</p> <p>11 the service, "Legalize You Documents"?</p> <p>12 A. It's like a notarization, when somebody</p> <p>13 comes to sign a document, and you witness this</p> <p>14 signature, and you sign it. It's like a notary</p> <p>15 public service.</p> <p>16 Q. Okay. And apart from witnessing or</p> <p>17 notarizing a signature, does, "Legalize You</p> <p>18 Documents," entail any other type of service?</p> <p>19 A. If someone wants to notarization, if he</p> <p>20 wants to send the papers to the embassy to be</p> <p>21 signed, we take the papers and send them to that</p> <p>22 embassy.</p> <p>23 Q. Okay. And the embassies to which you</p> <p>24 sign -- to which you send these papers -- let me</p> <p>25 withdraw that and start again.</p>

<p style="text-align: right;">Page 70</p> <p>1 A. ABU HBDA</p> <p>2 The embassies to which you send these</p> <p>3 papers, those includes embassies associated with the</p> <p>4 Palestinian Authority, or the Palestinian</p> <p>5 association; is that correct, sir?</p> <p>6 A. It's representative of the Palestinian</p> <p>7 population in Canada.</p> <p>8 Q. And do you understand that this</p> <p>9 representative of the Palestinian people in Canada</p> <p>10 is in some fashion associated with the Palestinian</p> <p>11 Liberation Organization or the Palestinian</p> <p>12 Authority?</p> <p>13 A. I don't know the relationship or the rules</p> <p>14 in that country. All I know is that it's a</p> <p>15 representative of the Palestinian application in</p> <p>16 Canada and it documents or certify documents.</p> <p>17 Q. Thank you, Mr. Abu Hbda.</p> <p>18 MR. SINAICO: Let's mark as our next</p> <p>19 Exhibit a 55-page document that is titled on the</p> <p>20 front page, "Declaration of C. Russell."</p> <p>21 This is Tab 10C. Cosette, could you bring</p> <p>22 it up, please?</p> <p>23 MS. VINCENT: It will be up shortly.</p> <p>24 (Whereupon, Declaration of C. Russell was</p> <p>25 marked as Exhibit 5 for identification, as of</p>	<p style="text-align: right;">Page 72</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes, sir.</p> <p>3 Q. And you were saying the signature there,</p> <p>4 that's your signature; is that correct, sir?</p> <p>5 A. Yes.</p> <p>6 Q. Do you see the raised seal immediately to</p> <p>7 the left of your black ink seal?</p> <p>8 A. Yes.</p> <p>9 Q. Is that a notarial seal?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Whose notarial seal was that?</p> <p>12 A. For me.</p> <p>13 Q. Okay. And do you see that there are a</p> <p>14 number of other stamps on this document? There's a</p> <p>15 stamp -- let me withdraw that.</p> <p>16 Do you see there's a stamp in blue ink,</p> <p>17 and there's a stamp in red ink on this document?</p> <p>18 A. Exactly, yes.</p> <p>19 Q. And, sir, is this an example of a document</p> <p>20 that Awni Abu Hbda Documentation Services legalized?</p> <p>21 A. It maybe like -- certificates, graduation</p> <p>22 certificates, death certificates, authorization.</p> <p>23 Yes, this is one of them; yes, maybe.</p> <p>24 Q. Okay. And are you able to read the blue</p> <p>25 ink stamp?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. ABU HBDA</p> <p>2 April 7th, 2021.)</p> <p>3 A. Yes, sir.</p> <p>4 Q. And, specifically, we're going to turn to</p> <p>5 Page 52 of the document.</p> <p>6 MR. SINAICO: Page --</p> <p>7 MS. VINCENT: Yeah, I'm going to have to</p> <p>8 exit out of there as quick as possible. I'll</p> <p>9 share my screen in a moment.</p> <p>10 MR. SINAICO: Can we rotate that around,</p> <p>11 so Mr. Abu Hbda could see that more clearly?</p> <p>12 MS. VINCENT: I'll rotate it. One moment.</p> <p>13 Q. Can you see the page that we're focusing</p> <p>14 on from Exhibit 5, Mr. Abu Hbda?</p> <p>15 A. Yes, I do.</p> <p>16 Q. Okay. And do you recognize that this is a</p> <p>17 document that you've seen before, sir?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Okay. And do you see that there's a stamp</p> <p>20 in black ink in the upper left-hand corner, and a</p> <p>21 raised seal, and the stamp in black ink says, "Abu</p> <p>22 Hbda"; do you see that, sir?</p> <p>23 A. Yes, I do.</p> <p>24 Q. And the stamp in black ink, that's your</p> <p>25 notarial stamp; is that correct, sir?</p>	<p style="text-align: right;">Page 73</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAICO: Cosette, could you zoom in</p> <p>3 on the blue ink stamp, please.</p> <p>4 Q. Is that okay, Mr. Hbda. Can you see it?</p> <p>5 A. It says, "General Palestinian Delegation</p> <p>6 Canada."</p> <p>7 Q. Okay. And is that the office in Canada to</p> <p>8 which you emailed documents when you want them</p> <p>9 legalized?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And now, let's look at the red ink stamp.</p> <p>12 Can you read the red ink stamp, sir?</p> <p>13 A. Not all of it.</p> <p>14 Q. Okay. Are you familiar with that stamp,</p> <p>15 sir?</p> <p>16 A. Yes, I've seen stamps like this.</p> <p>17 Q. So, although you're unable to read the</p> <p>18 stamp in its entirety, can you read the portions of</p> <p>19 it that you are able to read?</p> <p>20 MR. SINAICO: Let the record reflect that</p> <p>21 Mr. Abu Hbda translated the red ink stamp to the</p> <p>22 best he was able to --</p> <p>23 A. It says the a Palestinian delegation</p> <p>24 legalized this document, but it doesn't confirm the</p> <p>25 contents or the information inside this document.</p>

<p style="text-align: right;">Page 74</p> <p>1 A. ABU HBDA</p> <p>2 It's not responsible for the content inside this</p> <p>3 document.</p> <p>4 Q. And you can see inside, Mr. Abu Hbda, do</p> <p>5 you see that there is a blue ink signature inside</p> <p>6 the red ink stamp?</p> <p>7 A. Yes.</p> <p>8 Q. And are you able to tell us whose</p> <p>9 signature that is?</p> <p>10 A. To be honest, I don't know whose signature</p> <p>11 is that.</p> <p>12 Q. Okay. And this stamp, is this a stamp</p> <p>13 that's typically -- let me withdraw the question and</p> <p>14 try again.</p> <p>15 Is this red ink stamp a stamp that</p> <p>16 typically appears on documents that you have</p> <p>17 legalized for your clients?</p> <p>18 A. Not all the documents, no.</p> <p>19 Q. Do you have any understanding as to which</p> <p>20 types of documents this red ink stamp would appear</p> <p>21 on and which not?</p> <p>22 A. I'm not sure, but I think maybe it's the</p> <p>23 certificates that has this red ink stamp, while</p> <p>24 other documents, they don't have this stamp.</p> <p>25 Q. Okay. And do you have any understanding</p>	<p style="text-align: right;">Page 76</p> <p>1 A. ABU HBDA</p> <p>2 looking at the wrong document. I want to look at</p> <p>3 Tab 2, which is also Exhibit 4.</p> <p>4 MS. VINCENT: Sorry.</p> <p>5 MR. SINAIKO: It's okay. Take your time.</p> <p>6 Bear with us for just a moment, Mr. Abu</p> <p>7 Hbda.</p> <p>8 There we go. Back to Page 2.</p> <p>9 Q. Okay. Now, underneath, "Legalize You</p> <p>10 Documents," you see that there are a number of</p> <p>11 different types of -- there are a number of</p> <p>12 different entities on that page?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. The first one is, "Awni Abu Hbda</p> <p>15 Service Registration Form"; do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Can you tell us what that is.</p> <p>18 A. This is registering a client. If someone</p> <p>19 comes to my office, I register his office or enter</p> <p>20 his name in a book.</p> <p>21 Q. Ah. Is that a book where you record your</p> <p>22 notarial act, sir?</p> <p>23 A. It's a regular page. I don't see -- of</p> <p>24 this pages it changes day by day.</p> <p>25 Q. Got it. But, this service registration</p>
<p style="text-align: right;">Page 75</p> <p>1 A. ABU HBDA</p> <p>2 as to who placed the red ink stamp on this document?</p> <p>3 A. The council, or the delegation of both the</p> <p>4 council.</p> <p>5 Q. And that's a person in this office in</p> <p>6 Canada that you mentioned earlier, this delegation</p> <p>7 office to which you mail papers, which you would</p> <p>8 like papers legalized for your clients, correct?</p> <p>9 A. This is what this supposed to be.</p> <p>10 Q. Okay. But just to clarify, my question</p> <p>11 was the office where that stamp was applied was the</p> <p>12 office -- as you understand it, the office where</p> <p>13 that stamp was applied was the office in Canada to</p> <p>14 which you send documents when your clients asked you</p> <p>15 to have them legalized; is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okie doke.</p> <p>18 MR. SINAIKO: Now, let's go back for a</p> <p>19 moment to Exhibit 4. Okay. Now, Cosette, we're</p> <p>20 getting Exhibit 4 back up.</p> <p>21 MS. VINCENT: Yes, we are.</p> <p>22 MR. SINAIKO: Okay. And let's turn to</p> <p>23 Page 2 for Mr. Abu Hbda.</p> <p>24 MS. VINCENT: Is this the page you want?</p> <p>25 MR. SINAIKO: I'm sorry, I think we're</p>	<p style="text-align: right;">Page 77</p> <p>1 A. ABU HBDA</p> <p>2 form, this is not a document you would legalize?</p> <p>3 This is a piece of paper you have your clients</p> <p>4 complete, so you could provide services to them; is</p> <p>5 that correct?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. Going back up to Legalize You</p> <p>8 Documents for one moment. What do you typically</p> <p>9 charge clients to Legalize You Documents for them?</p> <p>10 A. If it's only notary public, I charge from</p> <p>11 five to 15 to 20; this is only if it's notary</p> <p>12 public.</p> <p>13 Q. Right. And if they're -- in the instances</p> <p>14 where you're asked to legalize a document by</p> <p>15 transmitting it to this office in Canada, what do</p> <p>16 you charge clients to do that?</p> <p>17 A. So, the service includes the postage that</p> <p>18 we use to send it, the fees that they charge us, and</p> <p>19 the preventative to cancel it, and our fees. So, it</p> <p>20 ranges from 250 to 300. Again, this includes the</p> <p>21 postage, and includes the money postage. We -- the</p> <p>22 money order to pay for the fees that we -- council</p> <p>23 charges, or that office charges, plus our fees to</p> <p>24 legalize the document. The total is between \$250</p> <p>25 and \$300 in total.</p>

<p style="text-align: right;">Page 78</p> <p>1 A. ABU HBDA</p> <p>2 Q. And Mr. Abu Hbda, what does your business</p> <p>3 charge -- let me withdraw that question and ask it</p> <p>4 more crisply.</p> <p>5 Mr. Hbda -- I'm going to try one more time</p> <p>6 here.</p> <p>7 Mr. Abu Hbda, what is your fee, putting</p> <p>8 aside the fees for postage, and fees charged by the</p> <p>9 council, whatever you charge, what is your fee that</p> <p>10 you charge for the document?</p> <p>11 A. Between \$50 to \$100.</p> <p>12 Q. And how frequently would you say -- well,</p> <p>13 let's just -- let me withdraw that question and try</p> <p>14 again.</p> <p>15 How frequently would you say that you send</p> <p>16 documents to this office in Canada that we've been</p> <p>17 talking about, this delegation of the Palestinian</p> <p>18 people that you mentioned; how frequently would you</p> <p>19 say that you send documents to that office that --</p> <p>20 to be legalized?</p> <p>21 A. It may be once a week or maybe every day;</p> <p>22 it's variable. It depends on the people.</p> <p>23 Q. So, would it be fair to say that over the</p> <p>24 last year, you've done that at least 50 times?</p> <p>25 A. I don't have the number. I cannot tell.</p>	<p style="text-align: right;">Page 80</p> <p>1 A. ABU HBDA</p> <p>2 A. Yes, sir. No.</p> <p>3 Q. Okay. Do the Passport Services that your</p> <p>4 company provide, or -- withdrawn.</p> <p>5 Do the Passport Services that your</p> <p>6 business provides relate in any way to passports</p> <p>7 issued by the Palestinian Authority, or the</p> <p>8 Palestinian Liberation Authority, to the extent such</p> <p>9 exist?</p> <p>10 A. We write an authorization between two</p> <p>11 persons; one person here and one person in</p> <p>12 Palestinian. This has no relation to the PLO, or</p> <p>13 the organization; it's two persons.</p> <p>14 Q. What is the nature of this authorization</p> <p>15 that you're talking about?</p> <p>16 A. It gives authorization to this person to</p> <p>17 renew the passport for that other person. We just</p> <p>18 notarized this document.</p> <p>19 Q. I see. Is this a document that's issued</p> <p>20 by the Palestinian Authority, and that you assist</p> <p>21 one of your customers in executing?</p> <p>22 A. No, most of the time we write it. It's a</p> <p>23 handwritten. This person authorizes that person to</p> <p>24 do the renew; that's it.</p> <p>25 Q. And is there a prescribed form of words</p>
<p style="text-align: right;">Page 79</p> <p>1 A. ABU HBDA</p> <p>2 Q. Okay. So, ballpark, you're not prepared</p> <p>3 to say you did it at least 50 times over the last</p> <p>4 year?</p> <p>5 A. I don't know. To be honest, I'm not sure.</p> <p>6 Q. But you'd say --</p> <p>7 Well, just to go back to what you said</p> <p>8 before. You'd say that you do it several times a</p> <p>9 month; is that correct, sir?</p> <p>10 A. Maybe more. I don't know.</p> <p>11 Q. Okay. Let's go down to a few steps on the</p> <p>12 document. Do you see that it says, "Passport</p> <p>13 Services"?</p> <p>14 A. This is in total.</p> <p>15 THE INTERPRETER: I will repeat the</p> <p>16 question. It seems he did not hear it.</p> <p>17 MR. SINAICO: Okay. Go ahead.</p> <p>18 A. Yes, sir.</p> <p>19 Q. And can you tell me, does, "Passport</p> <p>20 Services," include -- well, withdrawn.</p> <p>21 The Passport Services that your company</p> <p>22 provides, does that include the transmission of</p> <p>23 documents to the office in Canada that we've been</p> <p>24 talking about, the delegation of the Palestinian</p> <p>25 people, as you describe it?</p>	<p style="text-align: right;">Page 81</p> <p>1 A. ABU HBDA</p> <p>2 that that document needs to include in order to be</p> <p>3 legally valued?</p> <p>4 A. No, to accept another person to renew the</p> <p>5 passport, they accept any notarize document, only in</p> <p>6 America, not only for me, but in the whole state in</p> <p>7 America.</p> <p>8 Q. Right. And are these documents that are</p> <p>9 used to apply for or renew passports issued by the</p> <p>10 Palestinian Authority or the Palestinian Liberation</p> <p>11 Organization?</p> <p>12 A. No, these are the Palestinian passports.</p> <p>13 Q. Right. So, is it -- how -- well, let me</p> <p>14 withdraw that.</p> <p>15 How do you understand --</p> <p>16 After you prepare and understand and</p> <p>17 notarize one of these documents, how do you</p> <p>18 understand that your clients utilize these</p> <p>19 documents; in other words, what do they do with</p> <p>20 them?</p> <p>21 A. He sends these documents by FedEx to the</p> <p>22 other person, and after this leaves my office, I</p> <p>23 don't know what happens to him. I don't know</p> <p>24 anything about him after he leaves.</p> <p>25 Q. Okay. And this passport service that you</p>

<p style="text-align: right;">Page 82</p> <p>1 A. ABU HBDA</p> <p>2 perform in connection with passports by the</p> <p>3 Palestinian Authority, how long have you been</p> <p>4 performing that service?</p> <p>5 A. I don't know to be honest. I've been</p> <p>6 notarizing papers for customers for long time, but I</p> <p>7 don't have an idea of how long exactly.</p> <p>8 Q. Would you say it's been at least five</p> <p>9 years?</p> <p>10 A. Maybe. It may be five, it may be seven,</p> <p>11 it may be more. I don't know.</p> <p>12 Q. Okay. The preparation of these documents</p> <p>13 is important in order for a person in the United</p> <p>14 States to be able to obtain or renew a passport</p> <p>15 issued by the Palestinian Authority; is that</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. And did there come a time when you learned</p> <p>19 how to prepare these documents, so that they would</p> <p>20 be legally effective when presented to these</p> <p>21 authorities, you know, were presented to the</p> <p>22 Palestinian Authority?</p> <p>23 A. Sometimes --</p> <p>24 THE INTERPRETER: I'm sorry.</p> <p>25 A. Sometimes customers bring all of the form</p>	<p style="text-align: right;">Page 84</p> <p>1 A. ABU HBDA</p> <p>2 Authority ever explained to you any aspect of the</p> <p>3 process of the issuance or renewal of a passport by</p> <p>4 the Palestinian Authority?</p> <p>5 A. No.</p> <p>6 Q. Okay. And these Passport Services that</p> <p>7 you provide that are referenced on Page 2 of Exhibit</p> <p>8 4, have you ever performed those Passport Services</p> <p>9 in connection with the issuance or renewal of a</p> <p>10 passport, other than by the Palestinian Authority?</p> <p>11 A. Yes, there is. I performed services for</p> <p>12 passports to travel to Jordan, and, also, for the</p> <p>13 Egyptian government. So, anyone who come requesting</p> <p>14 this service, I file the form for him or for her.</p> <p>15 Q. Okay. Let's move down to, "Family</p> <p>16 Matters"; do you see that, Mr. Abu Hbda?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can you describe that service to us,</p> <p>19 please.</p> <p>20 A. So, if two people fight at home, like a</p> <p>21 husband and a wife, I try to solve the issue between</p> <p>22 them, and if there's another issue, like a daughter</p> <p>23 with her father, or a family member with another</p> <p>24 family member for the Palestinian population, I come</p> <p>25 and try to solve the issue for them.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. ABU HBDA</p> <p>2 papers written and sent to them from my home</p> <p>3 country, and they wanted to be notarized.</p> <p>4 Q. Right, but you mentioned -- thank you very</p> <p>5 much.</p> <p>6 You mentioned before, Mr. Abu Hbda, that</p> <p>7 sometimes you prepared the document, right?</p> <p>8 Sometimes you prepared the document that has to be</p> <p>9 notarized and then returned to the Palestinian</p> <p>10 Authority, correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. How did you learn the proper</p> <p>13 wording to put in these documents, so that when</p> <p>14 presented to the Palestinian Authority, the</p> <p>15 documents would have the desired effect?</p> <p>16 A. We made copies from the papers that were</p> <p>17 brought to us and then we started using them.</p> <p>18 Q. Okay. Have you ever familiarized yourself</p> <p>19 for the legal requirements for the issuance or</p> <p>20 renewal of a passport by the Palestinian Authority?</p> <p>21 A. I know that from the people who come,</p> <p>22 these people have spoken with the people who they</p> <p>23 want to authorize, and they gave -- they give them</p> <p>24 the information.</p> <p>25 Q. Has any representative of the Palestinian</p>	<p style="text-align: right;">Page 85</p> <p>1 A. ABU HBDA</p> <p>2 Q. Got it. And so is that a service that</p> <p>3 falls within the category of legalization of</p> <p>4 documents?</p> <p>5 A. Yeah, sometimes -- thank you. Sometimes</p> <p>6 they have written documents, or have filed claims</p> <p>7 against each other, and through each of them, and</p> <p>8 then they come, and the issue solve them; they try</p> <p>9 to discharge the claim, dissolve the claim, and they</p> <p>10 write the paper, and I notarize this paper.</p> <p>11 Q. And that's a service that you provide as a</p> <p>12 Notary Public of the State of New Jersey; is that</p> <p>13 correct?</p> <p>14 A. It is a service that I provide for the</p> <p>15 population, the Palestinian population, to solve the</p> <p>16 issues or the altercations between the persons.</p> <p>17 Q. And you know to whom these documents you</p> <p>18 note relating to Family Matters are submitted by</p> <p>19 your customers?</p> <p>20 A. I give it to the person responsible, and</p> <p>21 he submits it to the Court to discharge or resolve</p> <p>22 the claim after they drop the case, and all these</p> <p>23 services are free, just to clarify. I don't get any</p> <p>24 payment for these services; I provide it for free.</p> <p>25 Q. Excellent. And these services are with</p>

<p style="text-align: right;">Page 86</p> <p>1 A. ABU HBDA</p> <p>2 respect to legal proceedings in the United States;</p> <p>3 is that correct?</p> <p>4 A. If there is a claim, yes, but if there</p> <p>5 isn't a claim, we just try to solve the issue</p> <p>6 between them, and they come in peace between them.</p> <p>7 Q. Excellent. Let's move down to the next</p> <p>8 one here. It says, "Driver License Certification";</p> <p>9 do you see that one, sir?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Okay. And can you tell us what Driver</p> <p>12 License Certification -- withdrawn.</p> <p>13 Can you tell us what service Driver</p> <p>14 License Certification involves, or can you describe</p> <p>15 the service?</p> <p>16 A. Okay. So, they stopped at this entity</p> <p>17 before a while ago. We used to do a translation, if</p> <p>18 someone comes from an Arabic country, or the</p> <p>19 driver's license from that country, we try to</p> <p>20 translate and validate this driver's license, and</p> <p>21 notarize it, and he takes it to the DMV, but now it</p> <p>22 stopped. It's not longer available.</p> <p>23 Q. And when did that service cease to be</p> <p>24 available?</p> <p>25 A. It stopped at a point now, but they</p>	<p style="text-align: right;">Page 88</p> <p>1 A. ABU HBDA</p> <p>2 these Life Certificate documents have, you know,</p> <p>3 well -- withdrawn.</p> <p>4 Do you know whether any of the Life</p> <p>5 Certificate documents you've certified have been</p> <p>6 used for the purposes of collecting a pension, or</p> <p>7 money, or from the Palestinian Authority, or the</p> <p>8 Palestinian Liberation Organization?</p> <p>9 A. I don't know that.</p> <p>10 Q. So, it's possible that the answer is yes;</p> <p>11 is that correct, sir?</p> <p>12 MR. BERGER: Objection to the form of the</p> <p>13 question; calls for speculation.</p> <p>14 Q. Mr. Abu Hbda, you may answer.</p> <p>15 MR. SINAIKO: Can we have the question</p> <p>16 repeated for Mr. Abu Hbda, please?</p> <p>17 (Whereupon, the requested portion was read</p> <p>18 back by the reporter.)</p> <p>19 A. I don't know. I can't tell you. No, I</p> <p>20 don't know.</p> <p>21 Q. Okay. So, my question to you, sir, is, is</p> <p>22 it possible that the answer to the question is yes?</p> <p>23 MR. BERGER: I object to the form of the</p> <p>24 question; calls for speculation, and it's been</p> <p>25 asked and answered.</p>
<p style="text-align: right;">Page 87</p> <p>1 A. ABU HBDA</p> <p>2 specified certain authorized people to do this</p> <p>3 service.</p> <p>4 Q. Okay. So, when you say they -- when you</p> <p>5 say, "they specified certain authorized people," who</p> <p>6 is, "they"?</p> <p>7 A. The DMV in New Jersey.</p> <p>8 Q. Okay. Got it. Is that a service that you</p> <p>9 ever performed, so that a driver's license could be</p> <p>10 certified to any entity outside the United States?</p> <p>11 A. No.</p> <p>12 Q. Okay. Let's move down to, "Life</p> <p>13 Certificate." Can you tell us what service</p> <p>14 involves, "Life Certificate"?</p> <p>15 A. So, this service is a service where, from</p> <p>16 all over the Arabic countries, people are retired,</p> <p>17 and they have to prove that their still alive to</p> <p>18 receive their retirement. So, they come to my</p> <p>19 office with the proper documents that they have</p> <p>20 that -- the ID and the passport, and we write a form</p> <p>21 and they sign it. I notarize it to prove that this</p> <p>22 person is still alive, and then the person takes it</p> <p>23 and sends it to his government, and to be able to</p> <p>24 receive the retirement.</p> <p>25 Q. Right. And do you know whether any of</p>	<p style="text-align: right;">Page 89</p> <p>1 A. ABU HBDA</p> <p>2 MR. SINAIKO: Mr. Berger, let me ask the</p> <p>3 question.</p> <p>4 Q. Is it possible that one or more of the</p> <p>5 Life Certificate documents that you assisted in</p> <p>6 preparing have been submitted to the -- a -- or the</p> <p>7 Palestinian Liberation Authority, or Palestinian</p> <p>8 Liberation Organization, for purposes of collecting</p> <p>9 a pension or money from one of those entities?</p> <p>10 MR. BERGER: And I object to the question,</p> <p>11 even though it was re-worded, because it calls for</p> <p>12 speculation.</p> <p>13 MR. SINAIKO: Okay. The objection has</p> <p>14 been noted, and the Witness should answer.</p> <p>15 A. I don't know. Not even a single one. I</p> <p>16 don't know anything about these documents.</p> <p>17 Q. These documents that you assist in</p> <p>18 preparing, right?</p> <p>19 A. Maybe. I haven't done, not even a single</p> <p>20 one. I don't remember whether I've done it, or</p> <p>21 maybe I haven't done any of them.</p> <p>22 Q. So, you have no recollection, one way or</p> <p>23 the other, whether any of these documents were for</p> <p>24 the purpose of collecting a pension, or money from</p> <p>25 the Palestinian Liberation Organization, or the</p>